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ABSTRACT

A perspective on the state of reservation development is provided in this document, which reports the results of a study conducted among 25 Indian reservations to determine the degree of integration between CETA Indian manpower plans and the Overall Economic Development Plans. An introductory chapter provides a history of the study and identifies broad issues affecting the research, e.g., recent tribal government expansion and population increases on reservations. Research findings, based on field study and analysis of program documents, are reported under three topics: (1) reservation planning in general and reservation manpower planning in particular, (2) the linkages between CETA programs and economic development observed on the 25 study sites, and (3) the constraints to linkages imposed by the administration of the CETA program and the various other federal funding programs that provide support to reservation-based economic development. Nine exemplary program elements are identified; each illustrates feasible ways of integrating CETA and economic development. Study recommendations provide specific suggestions for long-range policy, for improvement in administration of the Indian CETA program, and for further phases of this study. Appendices include a bibliography of 50 entries and a variety of documents used to collect data at the study sites. (JH)

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STUDY OF CETA PLANS AND RESERVATION ECONOMIC DEVELOPMENT

For the
Office of Policy Evaluation
and Research, USDOL

FINAL REPORT

URSA URBAN AND RURAL SYSTEMS ASSOCIATES
SAN FRANCISCO, CALIFORNIA

SEPTEMBER, 1978

STUDY OF CETA PLANS AND RESERVATION ECONOMIC DEVELOPMENT

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SEPTEMBER, 1978

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16. Abstract

This report represents the results of a research and development study commissioned by the Office of Policy Evaluation and Research (OPER) of the Department of Labor. The study examined the relationship between CETA Title III Indian programs and Indian reservation economic development on twenty-five Indian reservations and Native Alaskan communities nationwide. During the study a wide range of materials were collected, and interviews were conducted with over 320 persons. The study analyzed the relationships between the CETA programs and the EDA, HUD, BIA, IHS, USDA, etc. funded economic development activities, and provided a perspective on the state of reservation economic development.

Findings of the study are focused upon an examination of reservation planning in general and reservation manpower planning in particular; the linkages between CETA programs and economic development observed on the twenty-five study sites; and the constraints to linkages imposed by the administration of the CETA program and the (cont. on back)

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Abstract, continued

various other federal funding programs which provide support to reservation-based economic development.

The findings also include the identification of nine exemplary program elements which support the integration of CETA and economic development. These elements which were developed by selected CETA Title III Indian prime sponsors will be documented and validated in a Phase II effort proposed by the Department of Labor.

Finally, a series of recommendations were developed which flow from the findings of the study and call for increased promotion of the integration of CETA and community and economic development. The study report presents the above and also provides a research design, a bibliography and a series of appendices which further define the research effort.

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- Mssrs. Ray Tanner, Ken Lim and Neil Daniel of the Indian Program Office of the Economic Development Administration, Commerce Department; and
- The Tribal Chairpersons, CETA Program Directors, EDA Planners, and other participants to the study without whose cooperation, candor and hospitality this study would have been impossible.

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I. INTRODUCTION

BACKGROUND

In the summer of 1977 the Office of Policy, Evaluation and Research of the Department of Labor issued RFP ETA/OPER 7709 titled "Study of CETA plans and Indian Reservation Economic Development." The first purpose of the study was to determine the degree of integration or lack of integration between CETA Indian manpower plans and the Overall Economic Development Plans (OEDPs) for Indian reservations. Subsequent to such findings, the contractor was to identify a number of particularly noteworthy approaches for the integration of the two plans with the aim "of facilitating their replication by other Indian prime sponsors."

The study required that a sample of 25 reservations was to be considered. The contractor was to analyze the CETA plans and the OEDPs developed by those 25 and to conduct on-site field visits to determine the degree of integration, to assess the relative impact of CETA on economic and community development, and to identify those programs or program elements which might be considered exemplary.

Urban and Rural Systems Associates (URSA) was selected to conduct the study. URSA, together with its subcontractor, Draper/Kelly Associates (DKA) had hypothesized in their proposal that an examination of merely the OEDP and CETA manpower plans alone would not be sufficient to identify the actual links between CETA and economic development on reservations, and proposed to focus more broadly on the economic and community development activities both planned and in operation on the study sites. The approach developed was exploratory in nature due to the lack of available primary and secondary data on both the use of CETA funds on Indian reservations and the linkages between CETA funds and reservation economic and community development.

The project began in December, 1977. With the assistance of the Division of Indian and Native American Programs of DOL and the Indian Desk of the Economic Development Administration, the study team selected 25 study sites

and secured the CETA plans and 18 of the 25 OEDPs prepared by the study sites. Through the cooperation of the study sites themselves, the study team was able to secure the remaining seven OEDPs, numerous OEDP updates and annual reports, other planning documents relevant to economic and community development, and updates in CETA plans. The study team also secured materials relevant to the recent DHUD special Indian Community Development Block Grant set-aside, the EDA Comprehensive Economic Development Strategy (CEDS), the Department of Agriculture's activities in support of Indian reservations, and materials from other agencies involved with Indian economic development (see Bibliography, below). The analysis of these materials provided a perspective on Indian economic development in general and upon the actual economic development activities both planned and in operation on the study sites.

Between February and July 1978 the study team conducted field visits to the 25 reservations. In addition, separate visits were conducted to six consortium prime sponsors which were located a significant distance from relevant reservation study sites. Interviews were conducted with over 320 persons, including Tribal Chairpersons and Chiefs, Tribal Council members, Tribal Executive Directors, CETA Directors and staffs, Planning Directors and EDA planners, program and project directors, enterprise managers and developers, and other key officials and individuals on or near the reservations.

Individual case study reports were prepared for all of the study sites. These reports provided a general background on the reservation, cited any update in CETA or economic development activity not reflected in the materials analyzed prior to the field trip, discussed the manpower and economic development planning processes observed, identified linkages between CETA and economic development, highlighted the relationships of the reservation to other federal agencies, and focused upon unique exogenous factors which, while often irrelevant to the study at first, appear to have a relationship to the potential of the individual reservation to maintain or expand its economic development activities.

The individual case studies also were critical data sources for the comparative analysis activities which are discussed below in this report. The comparative analysis was undertaken to discern the appropriateness of certain exemplary approaches to linking CETA and economic development for other reservation CETA programs. Accordingly, study sites were aggregated by population size to provide a perspective on the level of government (and CETA program administrative capability) which could reasonably benefit from an exemplary approach. Comparative analysis was also undertaken to discern discrete substantive areas which transcend mere differences in population.

It was hoped that, if a comparative analysis were conducted, certain issues of concern to DINAP and OPER might surface. Such comparative analyses were conducted with the understanding that each reservation is unique in its background and culture, available resources, economic development potential, and government structure and administration.

FACTORS THAT INFLUENCED THE RESEARCH

The exploratory nature of the study provided the study team with a degree of flexibility to expand the general analytical focus when the need arose. During the course of the inquiry, a number of events occurred which had direct impacts on CETA and its relationship to economic development on Indian reservations and as such should be discussed in this report. Moreover, in conducting the field trips and analyzing the data, we have come to the conclusion that there is a broader range of complex issues and current trends which indirectly shape the interplay between CETA and economic development on Indian reservations and in Native Alaskan communities. While each is sufficiently broad to warrant a separate study, we have chosen to highlight these subjects to provide OPER and DINAP with a general context which we believe is important to an understanding of the subsequent discussions of the CETA program and its linkages to economic development on reservations. The issues which will be discussed in light of their relative impact on the study include:

- The impact of DOL's Native American Economic Stimulus Program (NAESP);

- The formation of CETA Prime Sponsor regional organizations;
- The discussion over CETA reauthorization;
- The uniqueness of economic development on Indian reservations;
- The OEDP planning process and its relationship to economic development;
- The recent trend of tribal government expansion;
- The recent trend of population increase on reservations;
- The importance of CETA to tribal operations,
- The movement toward compatible economic development; and
- The "backlash" against Indian success.

Native American Economic Stimulus Program (NAESP)

In the summer and fall of 1977, $31,000,000 worth of grant funds were made available to reservation-based Title VI prime sponsors through NAESP. The program was characterized by a competitive application process. Multi-agency panels were convened to review the two phases of applications. In Phase I, FY 1977, Title VI prime sponsors received $14,000,000 in funding in six categories: paralegal, paramedical, waste disposal, domestic fuel, agriculture, and on-site management. In addition, $1,000,000 of § 303 (Farmworker) funds were made available for agriculture programs. In Phase II, FY 1978, 119 Indian and Native American CETA programs received $17,000,000 in fifteen categories: paramedical, paralegal, business management, agricultural, aquacultural, industrial park management, road construction, domestic fuel development, tribal management, hotel/motel management, waste disposal, emergency vehicle operation, apprenticeship, telecommunication, and electric power.

Fifteen of the study sites submitted NAESP applications. Twelve sites had at least one project funded.

The NAESP grants represented a unique effort for reservation CETA programs. By mandating that linkages be established with an on-going economic or community development effort, the program promoted the establishment of coordinative relationships between CETA programs, EDA planners, enterprise managers, and service program directors, often where none had existed

previously. By its competitive nature, the NAESP program represented the most significant level of manpower planning in which certain of the applicant tribes were involved.

The study was shaped in part by the NAESP process. The study team sought to learn of NAESP experiences and pursued lines of inquiry regarding the benefits provided, the problems presented, and the linkages created by the NAESP program. Hence, the study benefited from the availability of NAESP and the planning processes it fostered. The examination of CETA manpower planning was expanded and enhanced by NAESP.

Regional Prime Sponsor Organizations

In November, 1977, the Eastern Washington Indian Consortium hosted an Indian and Native American Information Exchange Council in Reno, Nevada. Representatives from Region IX and Region X prime sponsors and DINAP central and regional office staffs were in attendance. The information exchange provided the impetus for the development of regional prime sponsor organizations to engage in information sharing and support activities among prime sponsors and between prime sponsor organizations and DINAP. DINAP has supported the effort and has considered providing resources to regional organizations to conduct technical assistance and other support operations.

Another force for cooperative action is the Indian and Native American CETA Coalition, a Washington-based organization which, through its "Friday Report," has provided information regarding the CETA reauthorization legislation and its implications for Indian and Native American prime sponsors. The coalition has also been instrumental in promoting the interests of prime sponsors to DINAP.

The study team interviewed a number of CETA Directors who had participated in the formation of regional prime sponsors organizations. We learned that such organizations have filled a pressing need for information and support, and are considered to be a significant step in the improvement of communication and coordination of Indian CETA programs nationwide.

CETA Reauthorization

The extension of CETA by Congress obviously has and will continue to have a significant impact on Indian and Native American programs. The Congressional delay has placed a cloud over on-going planning efforts by Indian prime sponsors. Certain interviewers observed that the delay may retard efforts to promote increased linkages between CETA and economic development. In addition, the reliance upon CETA by Indian primes is at times so dramatic that the delay in reauthorizations has created an aura of concern and apprehension. Indian and Native American primes are anxious to secure eligibility for Title VII funding to promote OJT efforts and are hoping for a maintenance of Title VI funding levels. At this writing, neither of these issues has been resolved. As a result, DINAP's efforts to promote a more significant use of OJT funds may be compromised by the eventual CETA package. It is also clear that the decided preference of Indian and Native American prime sponsors for a multi-year funding system has probably been strengthened by the delay in reauthorization.

The Uniqueness of Economic Development on Indian Reservations

"Economic development" is the process of developing a self-sustaining system of improved utilization of land, labor, capital and technology toward creation or expansion of a permanent economic base through increased productive capacity and output and effective utilization and conservation of human and natural resources.

"Indian economic development" differs from rural economic development and from economic development in general because of: 1) internal factors related to indigenous cultural, social, governmental, and natural resource characteristics of Indians and Indian reservations; and 2) external factors concerning the relationships of Indian tribes with surrounding communities and their relationships with state- and national-level programs and agencies involved in economic development.

Internal Factors

Unique relationships exist between individual Indians and their reservations,

their land, their tribal government, and their economic development projects. Indians are members as well as citizens of their communities. They have strong religious, cultural, and economic ties to the reservation, to the tribe, to the clan, to their families, and to the land/water/air which constitutes the environmental system. Tribal government is an intimate part of Indian peoples' daily lives and is often the focus of their political, economic and social impulses. Land, air and water are regarded as resources to be used in good faith for the benefit of all the tribe and the ecosystem, rather than commodities to be bought and sold.

The importance of maintaining long-held values against the dominance of non-Indian culture is one element which differentiates Indian economic development from other rural or general economic development. In measuring the appropriateness of economic development on the reservations, social profits in tribal unity, pride and self-sufficiency must be counted along with the standard cost/benefit analysis, and may outweigh the latter. Indian people are not just voters or stockholders; they are co-owners, co-users, and intrinsic parts of their reservation and its various governmental and economic structures.

A key difference between Indian reservations, Alaska Native villages and non-Indian communities is the frequent communal ownership of property and the authority invested in governmental and community organizations for economic development. This is different from the principles of individual entrepreneurship and capitalism which serve as a foundation for American economic development generally, and which are carried through many, though not all, rural non-Indian economic development efforts. This means that economic development on Indian reservations must be focused on identifying and re-introducing new economic systems while, at the same time, not violating the social and cultural principles of the Indians and tribes. This also means that the economic development process must include development of the necessary infrastructures to support the new economic system, including governmental operations and basic community services. In non-Indian rural areas, political and community infrastructures generally exist. In addition, in rural economic development, the emphasis is frequently on

revitalizing traditional economies which are experiencing significant problems, rather than a primary focus on identifying totally new industries or activities.

External Factors

Unique relationships between Indian reservations, Native Alaskan communities and the non-Native American communities surrounding them can create significant differences between needs and strategies for Indian economic development, as opposed to rural or general economic development. Due to numerous and unfortunate actions and circumstances over the last several hundred years, Indian tribes have frequently become dependent upon non-Indian communities surrounding them to provide many basic services and resources. The result is that any income generated by the tribe or by individual tribal members is frequently "spent" off the reservation, furthering the economic development and status of non-Indian communities, but contributing nothing to the status and growth of the Indian community and reservation. This lack of contribution includes at the very least a reluctance on the part of local financial institutions to extend credit to tribal or individual enterprises, thus forcing tribes to rely on limited federal resources for seed money or development capital.

There is an increasing desire, therefore, on the part of Indian tribes, reservations and Alaska Native communities, to acquire self-sufficiency or at least a more equitable flow of economic resources between Indian and non-Indian communities. Thus, there is a desire for self-determination and self-sufficiency not only in terms of federal government involvement on Indian reservations (a common interpretation of the new emphasis on self-determination), but also from the involvement of surrounding communities directly or indirectly in the social and economic lives of Indians which is not to their long-term benefit.

Another classic distinction between Indian economic development and non-Indian rural economic development is the relative inactivity on Indian reservations and in Native Alaskan villages of many federal programs, policies and funding sources which have constituted the most consistent and

visible means of support to non-Indian rural America for 40 years. The many rural assistance programs which were devised in New Deal days--Federal Land Bank, Federal Intermediate Credit Bank, Bank for Cooperatives, Farmer Cooperative Service, Production Credit Administration, and Commodity Credit Corporation as examples--have had negligible effect on the lives of Indian America, although they have literally remade the rural non-reservation economy.

Moreover, the U.S. Department of Agriculture has had a relatively low profile on Indian reservations. The USDA, which is charged by the Rural Development Act of 1972 and other legislation with responsibility for developing rural areas, has not adequately met these responsibilities in Indian country. The situation may change. For example, state administrators with the Farmers Home Administration have been directed to focus major attention on the needs of Indians, and to provide outreach. Because USDA has, with the exception of Indian reservations, focused on agriculturally-related economic development activities, EDA has focused on other kinds of economic development opportunities in rural areas. EDA has carried this focus onto the reservations as well, and with USDA not addressing agricultural opportunities, there has been until recently a significant lack of attention to this potential area of economic development on Indian reservations.

The response of Indian reservations and Native Alaskan communities to their different needs and objectives in terms of economic development has frequently been the establishment of community and business structures which are diverse in their styles, but generally are all very different from the non-Indian world. Business structures on reservations include tribally-owned and operated enterprises with varying degrees of involvement by semi-autonomous boards of directors and/or outside corporations under contract; manufacturing plants owned by tribal governments, joint ventures with industrial firms; individual Indian and non-Indian entrepreneurships; agricultural cooperatives; consumer cooperatives; externally-owned manufacturing entities with profit sharing arrangements with local tribal governments and/or employees; tribally-owned enterprises established not for profit generation,

but for the distribution of beef stock, for example, to individual tribal members and for supplying meat for tribal celebrations.

Indian economic development, thus, differs from general economic development and rural economic development in terms of the internal economic and social histories, resources, needs and objectives of tribes and tribal members; in terms of historical and current relationships with surrounding communities; and in terms of past and current relationships with state and federal agencies concerned with directing or supporting economic development programs. An understanding of the differences between Indian and non-Indian economic development needs and responses helps to explain why the well-intentioned interventions by some non-Indian focused programs have sometimes been unsuccessful, at best, and often disastrous.

The OEDP Planning Process and its Relationship to Economic Development

Since the integration between CETA plans and Overall Economic Development Plans was to be the primary focus of the study, a discussion of the OEDP process is in order. The OEDP is an integral element of reservation development planning activities and is a prerequisite for designation for EDA program participation. Planning units must also update the OEDP annually to remain eligible to receive funds. Redevelopment areas such as reservations which are located in an existing EDD may use the districts' accepted OEDPs if they actually participated in and supported the OEDP planning process.

In addition to providing eligibility for EDA program benefits, the OEDP is in theory part of a locally initiated planning process designed to:

- create employment opportunities;
- foster more stable and diversified local economies;
- improve local conditions;
- provide a mechanism for coordinating the efforts of local individuals and organizations concerned with the economic development of their area.

Its preparation sets in motion an institutional process of economic development planning. OEDP committees have the responsibility of preparing the OEDP and the on-going development program. The OEDP committee is to be representative of the community. The structure of the OEDP committees on Indian reservations varies widely, sometimes composed of a broad spectrum of tribal members and sometimes limited to the Tribal Council (whose composition is also quite varied). The OEDP sometimes is prepared with the assistance of the Economic Development Representative (EDR) and received by the EDA regional office. The EDR also assists tribes in the pre-application and application process for projects.

The EDA Indian Program has a planning component which funds tribal planning programs and which is a critical aspect of EDA's overall funding and implementation process. These programs vary widely; many reservations have their own planner(s) while some receive planning assistance through a consortium or other multi-tribal organization. In many cases EDA-funded planning efforts are supplemented with HUD and other federal agency planning funds. Sophistication of local planning also varies widely. Since funding levels for most planning programs are relatively small, planning efforts are often confined to preparation of OEDP updates and EDA reporting. In some cases, funding levels are entirely inadequate, especially if planners are responsible for several reservations and must cover large geographic distances. For instance, the Inter-Tribal Council of Nevada has three planners who are responsible for 23 reservations dispersed throughout the state. Remote reservation locations and inadequate air transportation result in expenditure of valuable time and scarce administrative funds in travel alone.

The quality and effectiveness of Indian OEDPs are inconsistent. Many are realistic, relevant and well-conceived, while many are proverbial "wish lists." Some Indian communities view the OEDP as a paper requirement rather than as a true planning document. This is reinforced when tribal priorities enunciated in the OEDP are often ignored during the funding process. This latter point is critical. The OEDP is a planning document which must be

prepared to qualify the reservation as an approved redevelopment area and, thus, eligible for EDA grant funds. In order to have an individual project funded, the tribe must submit a pre-application, have it reviewed by the EDA regional office, submit an application, and enter into a contract. The tribe is informed if the project is deemed acceptable to EDA prior to this process. Often the project chosen is not the highest priority of the tribe, but rather reflects the funding limitations, and regional or national priorities of EDA.

The request for proposal defining this study stressed the link between the OEDP process and CETA manpower planning. Our field operations have found that the OEDP process is not always the most critical element in economic development planning for the following reasons:

- Preparation of OEDPs was not always done on a yearly basis. EDA required updates in 1976, and has required annual reports, but for some tribes (i.e., Santee, which had a 1968 OEDP and a 1977 update but no other interim updates), the OEDP process was not yearly and, hence, not compatible with a yearly manpower planning effort;
- OEDPs include discussions of CETA and manpower, but actual project funding and implementation will control the actual economic development thrusts that CETA should coordinate and link up with. The development of integrated OEDP documents may in part compromise CETA efforts since EDA application, review, and funding processes are often lengthy and may flow into more than one fiscal year.
- Other agencies -- HUD, FmHA, HEW, CSA, BIA, F & W, SBA, etc.-- are involved in economic development apart from EDA and the OEDP process, although the EDA planner is the key person in the planning process. Therefore, CETA linkages with other economic development efforts are in some cases as critical as the need to coordinate with the OEDP process; and
- OEDP preparation is but one role assumed by the EDA-funded planners on reservations. Planners are also required to monitor the construction of EDA-funded projects, to submit applications

for other economic development oriented efforts (HUD/CDBG, FmHA, etc.) and to monitor the development of such projects. Planners also assist the tribes and individual entrepreneurs in packaging BIA Business Development loans and grants and SBA loans. The importance of linking with the EDA planner is appreciated by many of the Indian and Native American prime sponsors.

In summary, the OEDP is but one of a series of planning and development processes which reservations and communities use in securing economic development support. This fact was consistently brought home during the study and has shaped our analysis. Early on we were forced to expand our inquiry beyond the OEDP process to insure that we gained a basic understanding of the state of economic development in Indian country. Our recommendations will reflect our belief that DINAP and OPER should expand their original study emphasis to promote the best interests of Title III Indian prime sponsors.

Growth of Tribal Governments

The Phase I research revealed some dramatic shifts in the size, operations and focus of tribal government operations in all of the 25 study sites. This expansion and improvement in operations has occurred since 1970. Prior to the 1970's, tribal government in the study sites was by and large limited in scope and function. Those reservations which received OEO funding had CAP agencies which would coordinate such programs as Headstart, family planning and perhaps alcohol and drug abuse programs. Often CAP directors assumed an overall management and assistance function also. For many others, tribal government consisted of the Tribal Chairman, the Tribal Council and a limited staff to handle its affairs. Very little executive responsibility was assumed. Since 1970 the combined impacts of EDA planning assistance, LPW Rounds I and II, Public Works, and Title IX and X; Manpower funds and and later CETA Titles II, III, and VI and Economic Stimulus Projects; Indian Action Teams; HUD 701 planning, Community Development Block Grants, and housing programs; NIAAA (now IHS) alcoholism programs, ONAP/ANA programs; and CSA programs (and a limited number of Community Development Corporations); the opportunities for contracting for existing BIA and IHS

service delivery responsibilities under PL 93-638; and the expanded educational funding provided for by the Indian Education and Self Determination Act have served to create the need for much larger tribal governance structures. The management and staffing of a complex array of programs and enterprises has created a difficult situation for many tribes.

Perhaps the most interesting characteristic of the phenomenon is that many tribal governments have in large part been able to absorb the changes without collapsing. They have exibited a high degree of flexibility, ingenuity and professionalism in this process in ways that would be difficult for similarly situated municipal governments.

The transition into new administrative models has not been achieved uniformly by all reservations, nor has the process of organizational change been accomplished without attendant problems. Growing pains are felt throughout Indian country where many reservations have been unable to reorganize and others where the process has created confusion and resentment in the staff and resident population. (It is interesting to note that EDA grants--both PW and LPW--have eased the organization process on some reservations by funding administrative centers which have been large enough to accomodate the administrative staffs of programs that would otherwide be widely dispersed throughout the reservations).

Growth in Population

Since 1970, reservations have experienced dramatic population increases as people have returned home, encouraged by the expanded job opportunities, new housing constructions, and expanded services which are now tribally controlled (as opposed to BIA and IHS). The high visibility of business enterprises such as sawmills, agricultural and aquaculture programs, and commercial operations are examples of relatively low labor-intensive operations which attract more than their share of job seekers back to the reservations. New housing is committed long before it has been completed, while long lines of housing applicants wait for even newer projects to be funded.

Any formal discussion of reservation population is hampered by the inadequate census figures available. Moreover, updated census counts conducted by the BIA or tribal organizations are not comparable across the board. Recognizing the problems presented by conducting an accurate count of population in Indian country, we still found the following to be significant:

Of the twenty-five sites,

- 2 reported an annual rate of population increase of over 25%;
- 6 reported an annual rate of population increase of over 10%;
- 14 reported an annual rate of population increase of over 5%; and
- all 25 sites reported annual rates of increase of over 2%.

Perhaps the most unfortunate element of the widespread population growth on Indian reservations is that the increases in population have not necessarily resulted in an increase in funds, even from those programs such as CETA where funding is tied directly to population. This is a result of the inadequate census figures of 1970 (which preceded much of the in-migration) and the inadequate employment updates performed by the BIA (usually through the Employment Assistance Program). The tribes will have to wait until 1980 to have an adequate count of their population (which will in turn assist program planning) and several, such as Spokane, Washington and Oneida, Wisconsin, have undertaken population surveys through their CETA programs to augment the demographic information now available and to prepare the reservations for the 1980 census.

The Importance of CETA to Tribal Operations

In the face of expanding tribal government operations and an across-the-board growth in population, CETA has surfaced as the most critical source of funding for the reservations surveyed during the study. FY 1977-78 CETA budgets reflected this importance especially with regard to Title VI Projects and public service employment placement.

CETA has been instrumental in providing support for tribal government operations, funding such critical functional areas as: planning, program administration, tribal courts and law enforcement operations, and project

operations (in all service delivery fields). Hence, CETA has been instrumental in supporting the development of service infrastructures and promoting self-determination in most of the sites studied.

The link to economic development (which will be discussed below) is no less substantial. CETA has enabled a number of the nascent enterprises on reservations to get off the ground by providing through PSE employment a kind of venture capital that is so often unavailable to tribal enterprises. In short, CETA placements provide an enterprise with the staff it needs which allows the enterprise to get to the point where its revenues are sufficient to support the staff. The addition of NAESP monies has produced an even more dramatic benefit, by enabling reservations to adequately train the staff supporting their enterprises while again providing subsidized employment or venture capital to the enterprise. Our findings suggest that NAESP became the major source of OJT-type support for the study sites. This is due to the fact that reservation-based CETA programs have not been successful in developing OJT programs with non-Indian owned firms. Classroom training and PSE were found to be much more prevalent than OJT on reservations. CETA Directors explained that: (1) reservation people wanted to work on the reservation, (2) local enterprises did not have the capacity to launch an OJT program, and (3) PSE and classroom training would be feasible in the long run.

Movement Toward Compatible Economic Development

As numerous commentators have noted, Indian economic development funding has not always reflected the best interest of the individual reservations which have received support. As Vine Deloria, Jr. put it,

> Schemes for bringing light industry into reservation areas have been foisted upon Indians for nearly two decades. One need only scan the accumulated press releases of the optimistic years of the 1960's to see the naivete which characterized early efforts to bring industries to remote reservations.
>
> ...A related feature of the late 1960's was the development of industrial parks and motels by tribes persuaded...that paradise lay just beyond the next project. Today, industrial parks... lie hidden in the weeds baking in the hot sun..[and] most of these [tourist] projects have long since scaled down to a local motel and on occasion for conferences and training sessions by the tribe itself, with little or no tourism to help pay for them.

While past funding efforts may have reflected national rather than tribal or reservation priorities, there is every indication that the latter part of the 1970s has been characterized by a shift to the funding of economic development operations that are more closely compatible with reservation priorities. Timber, agriculture, aquaculture and traditional arts and crafts oriented enterprises are being funded by EDA, CSA, BIA and the Fish and Wildlife Service. These projects, while faced with the same needs for management and administrative controls, seem to have a greater potential for success. However, it appears that individuals capable of managing such enterprises are more readily available on or near the reservations, and the highly technical problems presented by industrial parks and tourism complexes are not as prevalent in the more indigenous-based enterprises.

The thrust toward compatibility also seems to promote secondary or tertiary spinoffs such as local food production, cannery operations, etc. It remains to be seen whether such projects are successful, but it appears that they have a better chance of success.

A Backlash Against Indian Success

The past few years have seen the governmental, population and developmental expansion of many reservations in the U.S. They have also seen some dramatic court victories involving water and fishing rights, land claims, and restitution for past injuries. Furthermore, tribal lands once considered useless are now recognized as resource-rich and vital to our nation's energy policy. On the heels of these blessings has come the specter of an anti-Indian backlash that has prompted the introduction of Congressional legislation to terminate the special relationship between Indians and other Native Americans and the federal government. It has also spawned the formation of special private interest groups to lobby for that legislation.

Such movements have characterized much of the history of Indian affairs in the United States. Often the most virulent opponents of Indians are those who have stood to gain the most from the divestiture of reservation lands. The similarity between past repressions and the current backlash movement

is apparent to many in Indian country. Many people view much of federal programming to promote Indian self-determination as "termination." As such there is a paradox which faces many tribal governments--the desire to move quickly to achieve self-support, and the desire to retain the special relationship with the federal government. This has prompted some tribes to limit their use of PL 93-638 contracting to assure that the BIA and IHS will perform their responsibilities. It has prompted others to reject economic or community development opportunities for the same reason. In short, the recent success of many reservations has caused others to become more conservative; the recent availability of federal program support has caused other reservations to wonder how long it will last. And in many instances, it has occasioned the deterioration of relationships between reservations and surrounding non-Indian communities.

The preceding discussion has touched on a number of overriding issues which served to shape and expand the Study of CETA Plans and Reservation Economic Development. In succeeding sections of this report, the study findings are discussed, the conclusions and policy recommendations are presented, and the methodology prepared for the study is outlined.

II. FINDINGS

The findings which follow reflect the efforts of the study team to provide a general perspective on the relationship between CETA and economic development on twenty-five Indian reservations. A concerted effort has been made to present as broad a view as possible in the hope that the future efforts of the Department of Labor in promoting economic and community development on reservations will be successful. The nature of the study dictates that the findings be organized into a number of critical discussion areas. These include:

- Reservation Planning
- Linkages Between CETA and Economic Development
- Constraints to CETA Linkages
- Problems of Economic Development Support
- Exemplary Program Elements

RESERVATION PLANNING

The study team found that planning constitutes the most vital administrative activity performed by the reservation tribal governments represented in the study. This is due to the fact that reservation governments, unlike other non-Indian local general purpose municipal governments, have no significant property tax base to support them and must rely in turn upon the federal grant-in-aid system to support public services. Likewise, the federal government provides most of the support available for economic development on reservations due to the general reluctance of private lending institutions and private investment capital to become involved in Indian economic development. Of the twenty-five reservations visited, only six have had sufficient income from resource or economic development to maintain a level (albeit much lower) of tribal government without federal support if it became necessary.

This reliance on grantsmanship has resulted in a wide variety of reservation planning approaches. This variety is most apparent when an examination is

made of planning structures, planning funding sources and planning decision making responsibility.

Planning Structures

The following table provides a general perspective on the range of planning structures observed at the study sites.

TABLE 1

ON-RESERVATION PLANNING STRUCTURE

TRIBES/POPULATION	ED CONSORTIUM	PLANNING DEPARTMENT	SINGLE PLANNER	DISTRICT PLANNER	OTHER[a]
<1,000 (6)	6[b]	0	3	0	5
1,000 - 3,000 (8)	3[b]	7	0	0	4
3,000 - 5,000 (3)	0	3	0	0	1
5,000 - 10,000 (4)	0	4	0	0	2
>10,000 (4)	0	3	1	1	1
TOTAL	9	17	4	1	13

[a]Other includes: CETA-funded community advocate, planning commissioner, CETA-funded planner and resource developer, consultant, housing authority, planning committee, A-95 clearinghouse, industrial development commission, planning board, planning commissions, zoning board.

[b]One gets no support in development of the OEDP.

As the table indicates, planning for the smaller tribes is conducted through planning consortia. Responsibility for on-site project selection and priority setting may be vested in an individual while the major plan preparation activities are carried on by the central consortium. In two cases, the local planners functioned autonomously from the consortium central operations. The consortium structure is useful for small tribes without sufficient population size or administrative capacity to merit a full-time planner, and a reservation can receive valuable technical assistance through a consortium.

The consortium set-up is not always satisfactory. There is a general tendency on the part of consortium members to want to assume the major planning responsibilities for their reservations. Once local experience is attained

within the consortium structure, tribes may seek out their own planning grants. This situation occurred in two of the reservations under study. The problem this presents is that a period of staff development is required to become familiar with the application, monitoring, and administrative responsibilities formerly assumed by the consortium. Planners and tribal leaders must also establish and maintain relationships with federal agency representatives. Often, this process can be frustrating and difficult for both parties.

By far the most common on-reservation planning arrangement is through a planning department. However, the organization and administration of planning departments differ widely. Of the seventeen planning departments observed during the study, four were not administratively tied together but rather were made up of individuals who were funded through a number of planning grants and who had no internal working relationships. Of the remaining thirteen planning departments, only six have assumed planning structures which address comprehensive land use planning issues. The remainder are geared to program planning, application preparation and grants monitoring.

Funding

It is interesting to note that major planning responsibilities on thirteen reservations are assumed by entities or individuals other than the planning departments. As Table 1 suggests, these entities may include housing authorities and industrial development commissions. This is due in part to the availability of planning funds from different sources. Table 2 identifies the range of planning funding sources currently used by the study sites.

TABLE 2

PLANNING FUNDING SOURCES

TRIBES/POPULATION	EDA	HUD (701/CDBG)	BIA (93-638)	208	ANA	IHS/HEALTH (93-437, 93-638)	CETA TITLE VI[c]
<1,000	6	2	0	0	2	3	4
1,000 - 3,000	7[a]	8	4	2	4	3	3
3,000 - 5,000	3	3	2	0	2	1	1
5,000 - 10,000	4	3	2	0	4	0	2
>10,000	4	3	1	2	1	1	2
TOTAL	24	19[b]	9	4	13	8	12

[a]One is in a consortium but receives no assistance.
[b]Of these only nine have current funding.
[c]Planning trainee positions.

As the table indicates, the most consistent source of funding is through EDA Planning Grants. As such, EDA-funded planners represent the major planning workforce on reservations. As EDA-funded planners, they are responsible for preparation of the OEDP, support of the OEDP committee, preparation of OEDP updates and annual reports, and monitoring of most EDA-funded projects. Since EDA Planning Grants characteristically fund only one planner per site, it is difficult for EDA-funded planners to assume a broader reservation-based planning responsibility. Table 3 displays the structure of EDA-funded planning programs.

TABLE 3

STRUCTURE OF EDA-FUNDED PLANNING PROGRAMS

	FORMAL APPARATUS		EDA-FUNDED PLANNERS	
TRIBES/POPULATION	SINGLE TRIBE	CONSORTIUM	ONE	MULTI
<1,000	2[a]	6	2	3[b]
1,000 - 3,000	5	3[b]	6	1[c]
3,000 - 5,000	3	0	3	0
5,000 - 10,000	4	0	3	1
>10,000	4	0	3	1
TOTAL	16	9	17	6

[a]One planner is on-site but funded through a consortium at two sites.
[b]One consortium is now defunct.
[c]One tribe has no current relationship with its consortium.

As Table 3 suggests, only two of the larger tribes have more than one planner funded through the EDA Planning Grant. In a number of cases, the EDA-funded planner also assumes responsibility for Community Development Block Grant funding, HUD housing applications, and other economic and community development based planning efforts. The difficulty presented by this situation is that there is no one available to deal with the broader issues of comprehensive planning, land use planning, zoning and resource development planning--areas that are critical to the majority of the reservations in the study.

HUD-funded planning is somewhat of an anomaly. As Table 2 notes, a number of HUD-funded planning grants are now inactive. These represented 701 Planning Grants which resulted in the preparation of reservation-comprehensive plans. While a number of these documents remain useful planning tools, the bulk have been rejected. The problem with 701 Plans is that they were prepared by consultants who, upon the completion of the plans. often terminated their relationships with the reservations. Funds have not been uniformly made available to update these plans and the recent growth of reservations has often rendered them obsolete. Also, many of the recommendations included in the plans--housing developments, marinas, shopping centers, etc.--were overly ambitious and assume a level of non-federal investment that has rarely been provided.

A number of reservations have been able to secure planning support from Community Development Block Grant funds. On one reservation, CDBG-funded planners prepared the OEDP document and monitored EDA-funded grants. A number of the reservations that had relied upon CDBG funds for planning expressed some concern over the institution of the new Indian set-aside in CDBG. In the past, reservations competed against small communities for funds. In developing the set-aside program, HUD has suggested that reservations will no longer be eligible to participate in the small city programs. This may result in a net reduction in CDBG funds for those reservations which previously participated in the program, and may impose a hardship on them in their long-term planning and economic development activities.

The third largest source of planning funding has come through the Administration for Native Americans (ANA), the successor to the OEO CAP programs of the sixties. While CAP-related funds have been somewhat diminished in recent years, the ANA has maintained a general interest in building the management capacities of grantee reservations. ANA-funded technical assistance has for some time represented the broadest, most comprehensive, and most effective assistance effort available to reservations. ANA funds have also been used to support tribal newspapers, elderly programs, transportation programs and the like. ANA planning funds have supported community development planners who have assisted local programs in obtaining grant funds for services delivery. In at least one case an ANA funded planner has participated in all phases of reservation-based community and economic development planning.

Planning funds have also been made available through PL 93-638 and PL 93-437 for general and health-related planning. At the present time the role that self-determination funding will play in the long term in reservation planning is not known. Funds have been made available, but they do not appear to have been sufficient to support planners at a high enough rate of pay. Planner trainees are usually not qualified to assume major planning responsibilities.

The same problem, lack of adequate salaries, has affected the use of CETA funds for planning. CETA-funded planners are made available through Title VI which has a $10,000 salary limit which is often too low to attract qualified planners. Most of the reservations in the study cannot supplement that limit with tribal funds. Eight of the twelve CETA-funded planners were considered planning trainees, two assumed grantspersons roles and the remaining two are on NAESP grants. Both the grantspeople and the NAESP-funded planners assumed responsibilities which had immediate impact on their respective reservations.

CETA funding support of reservation planning efforts is an important link between CETA and economic development. In funding planning trainees, CETA

is promoting the development of reservation-based planning capabilities. Unfortunately, the need for additional planning funds is great right now. EDA currently provides the bulk of planning support, but, as indicated above, this is limited. HUD/CDBG funds may prove to be effective, but the limited CDBG resources could pose problems. ANA funds have been drastically reduced from the CAP levels of the 1960s. CETA and self-determination funds, while potentially helpful, have as yet not had a significant impact on reservation planning activities.

Planning Roles

The problems faced by reservations in obtaining planning support demonstrates one of the most critical gaps in federal funding support. Since reservation governments are in part slaves of the federal categorical grant-in-aid system, the bulk of planning that is done is crisis-oriented program planning which involves the preparation and submission of applications which may or may not be funded. As the following table indicates the major planning roles have been assumed by a range of individuals and groups at the reservation level.

TABLE 4

LOCUS OF MAJOR TRIBAL PLANNING FUNCTIONS

TRIBES/POPULATION	AREAS OF FUNCTIONAL RESPONSIBILITY								
	OEDP	EDA PROJECT APPLICATION	EDA-FUNDED PROJECT IMPL.	PROJECT MONITORING	CDBG APPLICATION	LAND USE PLAN	TA TO OTHER DEPARTMENTS	GRANTSMANSHIP	MANPOWER
EDA-FUNDED PLANNERS									
<1,000	6	5	0	4	2		1	3	0
1,000 - 3,000	7	6	3	3	2	1	2	5	0
3,000 - 5,000	3	3	1	2	0	0	0	1	1
5,000 - 10,000	4	4	1	2	2	0	0	1	0
>10,000	4	4	0	3	1	0	0	1	0
TOTAL	24	22	5	14	7	2	3	11	1
TRIBAL CHAIRMAN, COUNCIL, EXECUTIVE DIRECTOR									
<1,000	0	1	4	4	3	0	0	4	4
1,000 - 3,000	0	1	3	4	2	4	0	2	2
3,000 - 5,000	0	0	3	3	2	3	0	2	0
5,000 - 10,000	0	0	2	4	1	3	0	2	0
>10,000	0	0	4	4	0	4	0	3	0
TOTAL	0	2	16	19	8	14	0	13	6
CETA STAFF									
<1,000	1	1	0	0	0	0	1	0	5
1,000 - 3,000	0	0	0	0	0	0	1	0	7
3,000 - 5,000	0	0	0	0	0	0	0	0	3
5,000 - 10,000	0	0	0	0	0	0	0	0	4
>10,000	0	0	0	0	0	0	0	0	4
TOTAL	1	1	0	0	0	0	2	0	23
PROJECT DIRECTOR, PROGRAM HEADS, MANAGERS, NON-EDA FUNDED PLANNERS, HOUSING AUTHORITY									
<1,000	0	1	3	1	1	1	1	2	0
1,000 - 3,000	1	1	4	4	3	2	2	4	2
3,000 - 5,000	0	0	3	0	0	0	0	3	1
5,000 - 10,000	0	0	4	0	2	0	1	3	0
>10,000	0	0	4	0	0	0	0	4	1
TOTAL	1	2	18	5	6	3	3	16	4

Table 4 cites the roles played by four groups in reservation planning--EDA-funded planners, Tribal Chairmen and Tribal Councils, CETA staffs, and other reservation-based administrators. The areas of functional responsibility are those involved in preparing the OEDP, EDA project applications, EDA project implementation, project monitoring, land use planning, technical assistance, grantsmanship, and manpower planning.

As can be expected, EDA-funded planners assume the major responsibility for preparing the OEDP and EDA project applications and next to Tribal Executives and Councils are most likely to be responsible for project monitoring. They are involved in granstmanship--that is, assisting the reservation in gaining grants in any number of areas.

Tribal Chairmen, Councilmen, and Executive Directors, while not involved in OEDP or application preparation, are consistently involved in priority setting, monitoring, and implementation. Their role in grantsmanship is largely based upon the relative lobbying and advocacy roles they play in seeking funding. Other administrative staff, while rarely involved in OEDP or EDA project planning, are intimately involved in project implementation and grantsmanship.

It is interesting to note that CETA staff is rarely involved with planning activities other than those involved in administering the program. The study team tends to attribute this both to the considerable amount of time required to administer the CETA program and to the fact that CETA is involved in providing support to projects already underway rather than in the planning stages. In fact, CETA staffs work closely with all levels of tribal government in supporting on-going administrative and service delivery operations as well as tribal enterprises generally.

Manpower Planning

Apart from the preparation of the manpower sections of the OEDP document and the narrative of the CETA grant application, there is relatively little in the way of comprehensive manpower planning carried on at the reservations

studied. This is due in part to the general administrative requirements placed upon CETA Indian prime sponsors. CETA programs are funded on a year-to-year basis. During the past two fiscal years Indian CETA programs have become eligible for additional sources of funding through increases in Title VI allocations, the Youth Employment Training Program, and the Native American Economic Stimulus Program. Moreover, CETA programs consistently do not know what their yearly grant allocation will be due to Congressional delays in CETA fund authorizations. This constant confusion over what CETA funds, if any, will be available retards most desires to carry on manpower planning activities in the abstract.

The lack of manpower planning is also due to the fact that the administrative structures that have developed around the reservation CETA programs rarely include manpower planners. One is more likely to find a job developer or a manpower counselor, positions which require close interaction between the program, its clients and its placement services, rather than planning and analysis. With few trained manpower planners, reservations are reluctant to become involved in long-range manpower planning.

Manpower planning on Indian reservations is at best a difficult undertaking. Most tribes have not generated detailed information about labor force needs, available skills, etc. Most available manpower statistics relate to general labor force data such as the unemployment rate. The OEDP and CETA plan usually do little more than cite such gross statistics. Tribes often do not have the resources, staff or knowledge to undertake a comprehensive survey, although in many cases specific target groups have been identified, such as Vietnam Vets, mothers on welfare, etc., which permit more targeted programs to be developed.

Tribes must rely on the BIA for most of the manpower data. Nominally the responsibility of the BIA Employment Assistance Program, manpower statistics rarely reflect the actual manpower situation on a reservation. A number of CETA programs--notably Spokane (through its prime sponsor) and Oneida--are in the process of conducting reservation-wide surveys of population and employment to provide a data base for more detailed manpower planning

effort. A general employment survey had been conducted at Pine Ridge by the community college. Each was initiated because the statistics available from the BIA were either unavailable or clearly inaccurate.

Thus, manpower planning faces many of the same constraints that face reservation planning in general. And like reservation planning in general, the major focus of manpower planning is programmatic. There were three basic CETA planning activities which the study team found: Basic grant preparation, grant modification preparation, and NAESP application preparation. Each is tied to a particular product and involves a distinct planning process. The process used to develop the product reflects the structure of the CETA program and the range of participants in CETA planning.

Nine of the twenty-five study sites were members of consortia prime sponsors. Due to the multi-tribal nature of the consortia, the planning process necessarily varied from that of single reservation prime sponsors. The process used by consortia usually involved the activity of a CETA planning council made up of the Tribal Chairman and the CETA Program Directors of the member reservations. (On four reservations there was no local CETA administrative structure, only a coordinator to handle the considerable CETA bookkeeping functions.)

These planning councils are responsible for setting priorities and programming the allocation of grant funds on a reservation-by-reservation basis. The prime sponsor--usually an independent administrative unit located on a reservation or in a centrally-located municipality--is ultimately responsible for data collection and grant preparation. For the most part each reservation runs its CETA program independently of the other members of the consortium, although in at least one case members of a reservation were allowed to enroll in programs developed by another reservation in the consortium, and in a number of cases programs were developed by the prime sponsor in which all members participated.

Planning within the consortium setting is often more difficult than with a single reservation prime sponsor, because there are always submission dead-

lines to be met; it is often difficult to convene the planning council long enough to adequately set priorities and meet the expressed needs of the members; the number of members in certain consortia (two in the study had more than twenty members) make it difficult to adequately address all of their concerns; and the funding levels available to consortia are often limited by the two-fold administrative drain (central administration and reservation-based administration) on the grant.

Single reservation-based prime sponsors did not face the same administrative difficulties which plague consortium primes, but they were also confronted by certain obstacles in preparing grant applications. First, to provide the CETA staff with a perspective on the needs of the reservation and their general priorities, there was a need to establish manpower planning committees to assist in the preparation of the grant. The formation of the committee often took time and often involved some turnover. Selection of participants often involved appointment by the Tribal Council. Characteristically such committees were made up of other reservation-based program or project heads. In such cases, the Council set priorities on the development of projects and training programs which had an impact on the on-going activities of the committee members. This could be both a blessing--in that accurate information was provided--and a burden--in that members tended to set their programs up as the highest priority for CETA support. Also involved in such committees were Tribal Chairmen and Tribal Council members as well as representatives from the community. A number of CETA Directors praised the role of manpower committees in the development of Title VI projects especially. Most of the prime sponsors were concerned about adequately programming the Title VI funds. The role of the manpower planning councils in the development of Title VI projects enabled reservations to secure vital services. It appears that, where active councils were involved, the resulting projects were varied and committed to numerous innovative approaches to program planning.

The following table provides a general perspective on the on-site CETA planning operations observed during the study.

TABLE 5

ON-SITE CETA OPERATIONS

TRIBES/POPULATION	ON-SITE CETA PROGRAM STRUCTURE			CETA PLANNING STRUCTURE				TYPE OF COUNCIL		OTHER BOS FUNDS	
	CETA OFFICE	COMPONENT OF MAN-POWER/PERSONNEL DEPARTMENT	CETA COORDINATOR	MANPOWER COMMITTEE	PROGRAM/PROJECT HEADS	TRIBAL CHAIRPERSON	TRIBAL COUNCIL MEMBERS	AD HOC	STANDING	CONSORTIUM	TRIBE
<1,000	2	0	4	3	5	4	3	2	4	1	2
1,000 - 3,000	4	4	0	4	5	1	2	1	5	3	4
3,000 - 5,000	2	1	0	1	2	0	0	0	3	0	1
5,000 - 10,000	3	1	0	3	3	0	1	1	2	0	3
>10,000	4	0	0	2	2	1	0	3	1	0	3
TOTAL	15	6	4	12	17	6	6	7	15	4	13

As the table suggests, not all reservations established committees, and of those established, not all were standing.

Manpower committees together with the CETA Project Directors and their staffs were responsible for the preparation of a number of grant modifications during the last two fiscal years which reflected the addition of Title VI funds, youth program funds, and other grant support. The ability of the prime sponsor to program this money in a timely, creative and efficient manner reflected in large part the ingenuity of the manpower committee in establishing projects which helped meet the needs of the reservation. As later discussions will show, a number of the reservations were quite creative in developing projects which supported tribal economic development.

Table 5 also shows the relationship of committees to the securing of Balance of State and other CETA funding support. As later discussions will suggest, Balance of State of CETA Title I funds can provide a high level of support to reservation programs.

Perhaps the most dramatic example of creative manpower planning to support economic development involved the projects funded under the Native American Economic Stimulus Program (NAESP). The unique requirements of NAESP--that it was to be a competitive application process and that direct links to economic or community development efforts were to be established--forced applicants to assume a different posture in NAESP planning than they normally did with CETA.

The process resulted in the development of a number of interesting planning models which included:

- Consortium prime sponsors preparing applications for the consortium as a whole and with consortium members individually (EWIC, Tlingit Haida)
- Consortium members preparing proposals independent of other members and the prime sponsor (Lummi)
- CETA Program Directors preparing proposals with the direct input of the proposed program directors or departmental heads who would be ultimately responsible for the program (Papago, Oneida)
- Non-CETA program developers developing the applications without appreciable CETA program participation (Lummi, Pine Ridge)

In all, ten of the twenty-five sites did not submit NAESP applications for a variety of reasons, including not enough time, process did not fit into scheduling of planning, never received materials.

Given the fifteen project categories, the initial step in the process was project selection. Methods of project selection varied. For consortia, the prime may have either involved the members in a group priority setting session where members decided upon consortium-wide and individual projects, or in merely passing on the application guidelines to the members encouraging them to submit their own projects. One exemplary example of the former

method was developed by the Eastern Washington Indian Consortium, which made its resource developer/planner available to the individual tribes for project development.

For independent prime sponsors, project selection was a priority-setting exercise which involved different on-site representatives. For all NAESP applicants, project selection was a difficult exercise in Round I due to time constraints. Failure to be funded in Round I caused a few primes to disregard the process in Round II.

Generally, the NAESP planning process gave reservations the opportunity to engage in more formalized planning, to integrate programmatic themes and to address the training needs of staff for tribal priority projects. It also permitted a longer term for training.

NAESP planning processes varied, especially depending on whether a consortia or single reservation was involved. Some consortia staff provided strong planning and strategy assistance and assistance in proposal writing. One, Spokane, even had a planner who was assigned specifically to develop Economic Development proposals with the tribes. Other consortia provided overall planning but left it to the tribes to develop proposals, which they then reviewed and submitted to DINAP. In other cases, the consortium developed the proposals themselves, based on what they felt the needs to be, needs that had been identified as priorities in previous sessions, and submitted them for the entire consortium. Once funded, consortium members were given the opportunity to participate, while the prime sponsor retained program administration responsibility.

Once grants were awarded, the mode of actual project development varied from reservation to reservation. The primary project developers on-site were CETA staff, program heads, including planners, project directors, especially those who potentially would be heading the project, and a few proposals were developed with the assistance of outside trainers who would be doing the training if the project were funded. Of the fifteen reservations which did submit proposals, twelve had at least one project funded.

Some of the positive results of the NAESP process observed included:

- NAESP allows for a direct link to economic development planning and operations in ways that are beneficial.
- NAESP allows for a longer commitment to a project, allowing participants to receive adequate training for difficult job activities, and NAESP ensures funding of longer than one year, which is critical to the success of economic development.
- NAESP planning brought numerous key reservation actors together in planning efforts which heightened the understanding of CETA, apprised CETA personnel of the problems of economic development, and created an on-going atmosphere of mutual support

Table 6, below, gives a general perspective on the NAESP planning process. As the table indicates, there was almost equal involvement of CETA staff, program heads, and NAESP Project Directors on the project planning. This suggests a coordinated planning process not usually found in the reservation programs studied. Also, the fact that CETA program involvement was observed in the development stages suggests that the involvement of CETA staff in economic development extends beyond the planning phase.

TABLE 6

NAESP PLANNING PROCESS

TRIBES/POPULATION	TRIBE DID NOT SUBMIT APPLICATION	PROJECT PLANNING					PROJECT DEVELOPMENT				PROJECT FUNDED[a]	
		CONSORTIUM STAFF	TRIBAL COUNCIL	ON RESERVA. CETA STAFF	PROGRAM HEADS	PROJECT DIRECTORS	CETA STAFF	PROGRAM HEADS	PROJECT DIRECTORS	OUTSIDE TRAINERS	YES	NO
<1,000 (6)	3	2	1	3	1	0	2	0	1	2	2	1
1,000 - 3,000 (8)	3	2	1	2	3	4	0	2	2	2	3	2
3,000 - 5,000 (3)	2	1	2	2	2	1	1	2	2	0	1	1
5,000 - 10,000 (4)	2	0	2	2	2	2	2	1	1	1	2	0
>10,000 (4)	0	0	1	1	1	3	1	2	4	2	4	0
TOTAL	10	5	7	10	9	10	6	7	10	7	12	4

[a]Some tribes had some proposals approved and some not funded; includes approvals in FY 1977 and FY 1978.

LINKAGES BETWEEN CETA AND ECONOMIC DEVELOPMENT

The original focus of the study was upon the integration of CETA plans and OEDPs. After considerable field research it became apparent that the focus should expand to the integration of CETA and all economic development activities on reservations. As such, we have observed linkages between CETA and economic development in the areas of program planning, program development and program operations.

Planning Linkages

The very nature of economic development planning makes it difficult to integrate with CETA manpower planning. EDA and HUD projects (especially housing projects) may take years to be funded while CETA is programmed on a fiscal year basis. Hence, the appropriate time for linkages between the two is often after an economic development project has been funded or is in the final stages of review.

Although there was no evidence of comprehensive manpower plans being integrated into reservation plans, the study team observed a number of examples of coordinated planning that reflected a level of integration between CETA and economic development planning:

- On three reservations--Warm Springs, Oregon; Ft. Peck, Montana; and Salt River, Arizona--the on-going program planning activities of the tribal government reflected a close linkage between manpower and economic community development. The planning processes developed on these reservations served to integrate manpower planning into the day-to-day planning activities. It should be noted that each of these reservations has established a planning system which appears more sophisticated than those in place on the other reservations included in the study;
- NAESP planning involved EDA planners, CETA programs, departmental directors and others in "crisis-oriented," one-shot planning efforts. NAESP planning was the most prevalent example of coordinated planning observed which reflected the integration of CETA and economic development;

- In at least three cases, FY 1979 CETA Title VI funds were earmarked to EDA-funded projects which indicated the commitment of CETA funds in the project application process rather than after the fact;
- In a number of cases people involved with the CETA program also served on OEDP committees which were involved in the preparation of the OEDP document; and
- In a number of cases, the EDA planner served on the CETA manpower planning committee.

The following table represents an attempt to describe the linkages between CETA and the OEDP/Economic Development Planning process on the reservations studied.

TABLE 7

FORMAL LINKAGES BETWEEN CETA AND OEDP

PLANNING PROCESS

TRIBES/POPULATION	CETA-FUNDED PLANNING STAFF	CETA PART. IN OEDP PROCESS		REFERENCE TO CETA IN OEDP	INTEGRATION OF OEDP MAN-POWER PLAN IN CETA NARR.[a]	CETA PARTICIPATION IN PROGRAM PLANNING PROJECT
		OEDP COMMITTEE	CETA INPUT			
>1,000 (6)	4	2	2	3	1	3
1,000 - 3,000 (8)	3	3	5	5	3	4
3,000 - 5,000 (3)	1	1	3	2	3	2
5,000 - 10,000 (4)	2	2	4	2	3	3
<10,000 (4)	2	2	2	4	4	2
TOTAL	12	10	16	16	14	14

[a] In some cases this is use of OEDP statistics or EDA application statistics rather than formal manpower plans.

Table 7 reflects the formal linkages observed between CETA and the OEDP planning process (see Background for a discussion of the process). As mentioned earlier, one link is through the establishment of CETA trainee positions. On sparsely populated reservations, these positions are most critical because they often reflect the only on-site person involved in economic development planning. On larger reservations they represent individuals who can, with training, support the complex planning needs of larger reservations. CETA staff or Director participation on OEDP committees is critical because it provides the CETA staff with a perspective on economic development and keeps them abreast of economic development initiatives.

The columns referring to "CETA Input," "Reference to CETA in OEDP," and "Integration of OEDP Manpower Plan in CETA Narrative" all refer to the actual OEDP and CETA planning document prepared for the reservations. Of these, the most critical is the "CETA Input" designation because it reflects the general participation of the CETA Director in providing the EDA planner information to prepare the manpower portion of the OEDP.

The final category reflects the participation of CETA staff in the NAESP planning process. CETA program staff participation in the NAESP planning process was evident in fourteen of the fifteen reservations which submitted applications. As mentioned above, this was the most significant link between CETA and economic development planners and was cited often as the beginning of an established relationship between the two programs. In at least three cases, these program planning linkages have been extended beyond the NAESP process into the regular CETA planning process. One interesting point that should be made is that on a number of reservations--those of under 5000 population--there exist numerous informal linkages between CETA Directors and EDA planners. This often makes it easy for on-going communications and coordination between the two. For a number of the reservations this point was reflected somewhat in the fact that the CETA narrative and the manpower section of the OEDP were identical.

Developmental Linkages

The study team has designated "development" to identify those links between CETA and economic development that fall between the planning of a project or enterprise and the actual operation of that project or enterprise. Accordingly, "development" connotes those CETA staff development activities involved in preparing the staff of a project for their eventual work activities and the support provided by CETA in the actual construction or "development" of project facilities.

Due to the lack of available training resources on a number of reservations, the limited time available for training under the OJT and classroom training elements of the CETA program, and emphasis placed on Title VI in the reservation CETA programs, the developmental linkage appeared to be the weakest of the linkages between CETA and economic development observed by the study team--that is, if one disregards the NAESP program which represents a strong and important developmental link.

The lack of OJT programs on reservations is due to a number of factors. First, there are few non-Indian enterprises willing to institute such programs. The tribally-owned industrial plants were more likely to use Title VI placements rather than OJT, and the non-Indian owned plants were more likely to use the BIA OJT program.

The BIA OJT program supports adult vocational training. A firm located on or near or intending to locate on or near a reservation may enter into a contract with the BIA to train Indian workers who will work in the plant when it is constructed. In some cases the BIA will pay the expenses of sending the Indian OJT candidate from the reservation to the company's manufacturing plant in another city or state for training.

Since there tends to be a rather high rate of labor turnover and absenteeism in the first year among industries which locate on Indian reservations, the fact that the OJT program is continuous and reimburses the company up to one-half the starting wage for each worker in training, means that low labor costs can be maintained. The contract amount is agreed upon by the BIA and the

company, with the company designing the training program it requires. The maximum term of training is two years with few exceptions.

The benefits provided by the BIA OJT program may outweigh those of the comparable CETA OJT program. First, the tribe is not necessarily involved in the effort. The BIA and the branch plant can maintain their relationship apart from the tribe. The situation may tend to promote heavy turnover. The company has an incentive to maintain as many people as possible on OJT to serve the subsidy. Apparently there is no counseling component tied to the program (at least that is what our observations revealed). Hence, the plant may ultimately hurt the tribe in its efforts to establish a stable work force.

One solution that is available to overcome the potential abuses present in BIA OJT is for the tribe to contract for it under PL 93-638. We do not know if it is possible for a tribe to do so, but inquires could prove positive. The contracted program could be run by the CETA program and orientation and other Title III services could be made available to BIA OJT trainers. Absent such a set up the corporation would opt for BIA OJT and the tribe may go along to preserve their CETA funds for other efforts.

An interesting issue which surfaced during the research was the provision of developmental training to a number of Title III primes and consortium members by Title I or Balance of State prime sponsors. Oneida, Nett Lake, Pyramid Lake and Santee received support from other prime sponsors in developing programs. (This raises an interesting point and that is, what should the role of DINAP be in assisting prime sponsors in tapping into state and local CETA funds? Most of the prime sponsors had attempted to secure such support for their programs, but not all were successful. Oneida's effort in securing local support and the Papago effort in organizing reservation and urban Indians to advocate for support were potentially exemplary efforts in this regard.)

It appears that the key to developmental efforts in training, including NAESP, is the mobilization of local training resources, including the involvement of community colleges, reservation-based colleges, vocational-technical institutes, etc. Mobilization of these key resources and their involvement in CETA planning and program development is an important element in a smooth running CETA program. The addition of a resource development specialist who could also serve as the CETA planner (see above) would be a beneficial addition to the CETA staff. (The Eastern Washington Indian Consortium has a planner/resource developer on the staff who assists the consortium members.)

With regard to construction or facilities development, the study team observed a number of cases where CETA-funded construction efforts performed BIA/HIP, HUD modernization, or other construction rehabilitation activities. What is involved is the formation of a Title VI project to conduct the necessary activities. These activities either supplement or take the place of the training and work efforts performed by the Indian Action Team programs of the BIA.

Table 8 below illustrates the linkages between CETA and the development of reservation projects, including construction of projects and staff preparation for the running and management of projects. Less than half of the tribes have used CETA trainees for construction of projects and facilities; most of these were for EDA- and BIA-funded activities. CETA was linked to BIA-Tribal Work Experience Program (TWEP) in only one instance, and to the Indian Action Team (IAT) only four times. In these cases IAT training funds were used as a first step training level and as people were trained they were elevated to CETA, at a higher salary level. This step ladder enabled tribes to provide a longer training period, which is especially important when developing skills in construction, which usually requires an apprenticeship of several years.

In spite of HUD and EDA funding of millions of dollars worth of Indian projects, many projects are forced to go off the reservation for bid due to

timing requirements of agencies or the necessity of going to the lowest bidder. Tribes with force accounts were able to save money, and to utilize Indians for their own construction projects while providing training opportunities.

TABLE 8

CETA LINKAGES-DEVELOPMENT (CONSTRUCTION, STAFF PREPARATION)

	PROJECT TYPE					TRAINING LINKAGES			
TRIBES/POPULATION	HUD	EDA	BIA	CDBG	OTHER	TWEP	IAT	BOS	OTHER TRNG. PGMS./ COLLEGE/ TECH. INST.
<1,000	2	3	1	2	2	0	1	1	2
1,000 - 3,000	1	3	3	0	1	1	2	2	3
3,000 - 5,000	1	1	1	0	0	0	1	0	0
5,000 - 10,000	1	2	2	1	1	0	0	0	0
>10,000	0	2	3	0	1	0	0	1	2
TOTAL	5	11	10	3	5	1	4	4	7

Operational Linkages

The most significant link between CETA and economic and community development on the reservations studied is the operational link--the support provided by PSE enrollees to programs and enterprises and the actual operations of the NAESP grant programs. In a number of cases, CETA provides the sole source of capital for tribal enterprises. The following is a listing of the operational support provided by CETA to the reservations studied:

- 12 of the 25 reservations received planning support
- 25 of the 25 reservations received administrative support
- 17 of the 25 reservation Housing Authorities received support
- 14 of the BIA agencies received support
- 20 of the 25 reservations received support to their health and social services programs
- 22 of the 25 reservations received direct support to their economic development enterprises

An examination of the field trip reports will give a better indication of the economic enterprise support provided by CETA, but the following is an abbreviated rundown:

Hannahville, Michigan	- agriculture, swine farm, construction (IAT), store
Craig, Alaska	- none, due to unique makeup of profit and non-profit entities at regional and village level (see trip report)
Santee Sioux	- tribal store, agriculture program, cannery (NAESP), industrial development (NAESP)
Pyramid Lake	- aquaculture project (Title I); fencing project
Nett Lake	- timber mill
Passamaquoddy	- trucking company, construction, food co-op
Hoopa	- forestry service
Spokane	- agricultural program
San Juan Pueblo	- none; informed that enterprises (even tribally owned) not eligible for Title VI
Mescalero	- none; informed that enterprises (even tribally owned) not eligible for Title VI
Salt River	- sand and gravel operation, construction company
Lummi	- none; informed that enterprises not eligible
Oneida	- refuse service, agricultural programs (NAESP), support of planned print forms plant
Warm Springs	- none; informed that enterprises not eligible
Fort Hall	- agriculture, trading post, livestock complex
Fort Berthold	- tribal utilities, maintenance service
Choctaw	- development company (YETP), arts and crafts store
Cherokee, N.C.	- land project, construction
San Carlos	- peridot project, jojoba project, tribal bowling alley (planned), agriculture and irrigation

Wind River	- pole-post enterprise, Arapaho Ranch
Fort Peck	- construction (NAESP), domestic fuel (NAESP), industrial park management (NAESP)
Rosebud	- ranching, construction
Pine Ridge	- arrow factory, agricultural program (NAESP), telecommunications (NAESP)
Papago	- agriculture (NAESP), livestock (NAESP), industrial development (NAESP)
Cherokee, Okla.	- tourism, agriculture (orchard-ranch)

As the above list suggests, a number of tribes were advised that use of PSE funds for tribal enterprises was not permitted. It is interesting to note, however, that PSE provides a source of venture capital to allow nascent enterprises, with no line of capital, to support operations in getting a position where they can become self-supporting and eventually profit-making.

It is also interesting to note that the profits, if they are ever achieved, are in many cases to be committed to the maintenance of human services programs which are sadly underfunded. There needs to be a clear definition of the potential for PSE and NAESP funds and, if necessary, the drafting of legislation to exempt Title III prime sponsors from some of the more restrictive and irrelevant regulations tied to CETA nationwide.

Table 9 presents the range of operational linkages observed on the study sites.

TABLE 9

CETA LINKAGES--OPERATIONS

TRIBES/POPULATION	TRIBAL STAFF		HOUSING AUTHORITY	BIA	HEALTH AND SOCIAL SERVICES	ECONOMIC DEVELOPMENT PROJECTS	OTHER LOCAL SERVICES	MAINTENANCE
	PLANNING	ADMINISTRATION						
<1,000	4	6	5	0	3	5	1	1
1,000 - 3,000	3	8	4	4	6	7	5	2
3,000 - 5,000	1	3	1	2	3	2	2	1
5,000 - 10,000	2	4	4	4	4	4	3	1
>10,000	2	4	3	4	4	4	3	1
TOTAL	12	25	17	14	20	22	14	6

CONSTRAINTS TO CETA LINKAGES

CETA is vital to the operations of most tribal governments visited in its support of essential social services provision, in direct linkages to economic development ventures, and in the development of a governmental structure capable of managing future economic activities. During the site visits, however, mention was consistently made of a number of factors which act as constraints to more efficient utilization of CETA and as impediments to linking CETA to tribal economic development efforts. These factors have been grouped into discrete areas:

- Communication
- Regulations
- Reporting Requirements
- Assistance

Table 10 below details the consistency with which the problems with DINAP support were mentioned by the study sites. It should be noted that in collecting data regarding problems with CETA support, reservation representatives were not asked to respond to direct inquiries about support. Rather they were asked about problems with CETA in general. The table below reflects the efforts of the study team to organize the responses.

TABLE 10

PROBLEMS EXPERIENCED IN OPERATIONS OF CETA PROGRAMS

	TOTAL	TRIBES/POPULATION: <1,000	1,000 - 3,000	3,000 - 5,000	5,000 - 10,000	>10,000
• Communication--delays in grant award notification	3	1	0	0	1	1
--Too slow from Washington	11	1	1	2	5	2
--Too limited	10	1	1	2	2	4
--Limited feedback	4	0	2	0	1	1
• Regulations						
--Title VI 15 week unemployed	19	2	3	3	6	5
--Others 30 days unemployment	9	2	2	1	1	3
--Nepotism	14	2	3	2	4	3
--Time limits for participation (training)	12	3	1	3	2	3
--Income limitations (per capita share)	5	2	1	2	0	1
--Time limits for participation (PSE)	14	2	2	1	4	5
• Reporting requirements						
--Modifications	15	3	3	1	6	2
--Fiscal reporting	12	2	4	2	4	0
--Limited time frame	9	1	3	0	1	4
• CETA salaries						
--Too low (AFDC or other assistance higher; cost of living high)	3	0	0	0	0	3
--Too high (local businesses can't compete)	2	1	0	0	0	1
--Limited PSE prevents higher level of training	7	1	1	2	3	0
• Would like multi-year funding	18	2	3	3	7	3
• Assistance						
--Conflicting information from DINAP	8	2	0	1	4	1
--Gap in funding support	6	2	1	0	2	1
--Turnover in DINAP PO staff	10	1	0	1	1	4
--Lack of on-site TA	12	1	2	2	5	2
--Lack of relevant training opportunities (planning and program development)	9	0	1	1	2	5
--No support for BOS attainment	6	1	1	2	2	0

Communication

Problems were noted with respect to communication from DINAP, especially from the Washington office. There is no regular flow of communications from DINAP. Bulletins are issued from time to time but many tribes expressed a desire for a more consistent and informative pattern of communication. When communication is established, it is usually one-way, from Washington to the tribes or regional offices and slow in coming. The table reflects this concern about delay. Eleven sites reported that communication was slow. It should be recognized that a number of those sites were members of consortiums. DINAP policy is to communicate directly to prime sponsors. Consortium members must rely upon the prime to provide them with information. This creates a definite time lag and creates problems for both prime sponsors and their members. Tribes receive a great deal of support from their consortia, whether it be in administration, management, planning, or other types of assistance. Some tribes are generally satisfied with the consortium arrangement, while others expressed a strong level of dissatisfaction. A few were in the process of becoming prime sponsors, either because of their size or dissatisfaction with the performance of the consortium.

Some tribes, especially those which are not very small, felt that the administrative overhead pulled off by the consortium was a drain on the total amount of resources due the tribe. The presence of a consortium imposes another level of bureaucracy, and tended in many cases to exacerbate communication problems between the tribes and DINAP. In once instance a consortium member did not receive notification of NAESP until one day before the proposals were due, and at that received only the cover letter and not the packet of information describing the program. The additional level of CETA program administrators also makes a participatory planning process difficult, given the limited time DINAP usually allows for modifications and applications.

Some tribes complained of a total lack of services on the part of the consortium. In a few cases the consortium drew a large overhead rate for administering a CETA program that was in reality almost completely administered by the tribal CETA staff. Tribal CETA staff have also experienced difficulty in some cases in obtaining assistance or information from the DINAP project

officer, who insisted on dealing only with the consortium staff. This is a problem, especially when the tribe staff could not obtain the necessary assistance from the consortium.

Many tribes would like to see more of a dialogue between DINAP and the field. Areas where communication was cited to be deficient were: grant award notification, general program changes or announcements (such as NAESP), information about other CETA programs, regulations, pending legislation, and requests for information. An area of particular concern was the impact of proposed changes in CETA legislation on CETA programs. Deficiencies included delays in response from DINAP, too limited amount of information provided, sporadic communication, and limited feedback--especially on proposals or applications submitted.

A number of reservations offered feedback about NAESP. While there was much enthusiasm for NAESP and hopes that it be continued in some way, some general issues were raised that highlight the communication problems cited above. Ten out of the twenty-five tribes interviewed did not submit NAESP applications. Many (including tribes who did submit) did not have enough time in Round I to prepare their proposals adequately. Several, including some consortium members, did not receive information in time to prepare an application. Since most project officers were not very knowledgeable about NAESP, limited assistance was available in project planning and development. A few tribes did not receive sufficient funding to implement their projects as planned, and a few experienced severe delays in funding and grant awarding. There was limited feedback on why applications were not funded.

It should be noted that during our field trips, the concerns listed above were not focused on specifically during interviews. Rather, we asked generally about problems that staff may have experienced with CETA so that CETA program administrators would highlight the problems most important to them. Since we did not probe but let the tribes identify the problem areas, it is possible that more tribes than those which mentioned them may be experiencing similar problems. The following table represents the problems experienced with the NAESP program.

TABLE 11

PROBLEMS EXPERIENCED WITH NAESP PROGRAM

TRIBES/POPULATION	--Did not submit applications for various reasons	--Not enough time in round one	--Did not receive materials in time	--Funding may not be sufficient to do project as planned	--Limited assistance in project planning and development	--Limited feedback on project submission	--Delays in funding and grant awarding	--Limited feedback on why applications not funded	--Did not know what selections process was made up with
<1,000	3	2	1	0	1	0	0	0	0
1,000 - 3,000	3	5	3	0	3	1	1	3	0
3,000 - 5,000	2	3	2	0	2	2	1	2	2
5,000 - 10,000	2	3	1	1	1	0	1	1	0
>10,000	0	0	1	2	1	1	0	0	1
TOTAL	10	13	8	3	8	4	3	6	3

The problems enumerated are almost all involved with communications and the desire of CETA programs to engage in a dialogue with DINAP and their individual project officers.

During the study a number of DINAP efforts to improve communication were started. Regional prime sponsor organizations were formed to assist in inter-program information sharing and the Indian and Native American CETA

Coalition was encouraged to communicate to the prime sponsors regarding the implications for CETA Indian programs of the CETA reauthorization legislation in FY 1979. During the latter part of the field research phase, respondents were not as adamant about communication problems as they had been earlier. However, all would agree that inadequate communications does remain a considerable problem.

Regulations

Many of the problems that Indian CETA programs experience with CETA regulations are inherent in the CETA program itself and arise because the regulations were devised for non-Indian economies and do not recognize the unique conditions and needs of Indian tribes and Alaska Native communities. For instance, most unemployment on reservations is structural and will not be alleviated until tribal economies are relatively self-sustaining. Regulations requiring 15 weeks of unemployment prior to use of Title VI, 30 days for other Titles, disregard the seasonal nature of much tribal employment activity and the cyclical nature of employment for even the most skilled workers. Time limits for participation in training and PSE are also unrealistic in many instances, since the training period may not be long enough to adequately train someone in needed skill areas, since there may be no positions available in unsubsidized permanent employment once the term is completed, and since the tribe may not have adequate sources of funding to provide adequate support in public service areas. Seventy-six percent of the reservations studied cited the mandatory 15-week unemployment figure and 56% of the reservations cited the limits in PSE participation as detrimental to their reservation development.

The issue of participation presents an increasingly difficult constraint on Indian economic development. As the findings above suggest, CETA is a vital resource to reservation economies and economic development. If suggested changes in PSE and OJT programs which further limit participation by enrollees are enacted and applied to reservations, there could be dramatic repercussions for Indian Title VI prime sponsors.

Enforcement of the requirements regarding nepotism has also been a problem given the interrelatedness of tribal families, and the small size of many of the tribes studied. DINAP interpretation of eligibility for participation in CETA when tribal members receive per capita shares from royalties, etc. was also uneven. Sometimes tribal members could participate in training but other times a per capita share was construed to be income, so that potential trainees exceeded income requirements. Limitations on PSE salaries prevent CETA from being used for higher level training, especially for management. This situation occurred at some of the more organizationally complex reservations.

Besides the problems with time participation and maximum length of participation for Title VI, a further problem exists when some tribes have tried to use Title VI for "for-profit" enterprises. Here again, DINAP interpretation has varied, and considerable confusion exists regarding use of Title VI. In most instances so-called for-profit tribal enterprises have yet to show profits. Income generated from these enterprises is earmarked to support tribal operations, especially in the provision of services. Some tribes have been able to use CETA Title VI for enterprises and others have been told it is not an allowable use. This provision often prevents the integration of manpower and economic development.

Reporting Requirements

Another problem area relates to reporting requirements. Many tribes commented that a very limited time frame in which to respond to DINAP requests for reports and modifications, as well as the amount of paperwork required, put stress on already understaffed CETA offices. A large number of tribes complained of the time-consuming and burdensome process of preparing modifications. Most tribes felt that multi-year funding would considerably enhance planning and project integration efforts. Many tribes, both those with complex accounting systems and those with relatively unsophisticated fiscal capabilities, expressed the desire for a simpler accounting system that could be integrated into overall tribal accounting and administration overhead budgeting.

Assistance

Support from project officers is necessarily limited by the small number of regional staff and the breadth of assistance required. Consistency in project officer support is constrained by the frequent turnover of regional staff; this inhibits continuity in reservation CETA programs with respect to a relationship developed between a project officer and the CETA staff, especially since each reservation or consortium has a unique set of problems and needs. CETA staff often receive conflicting information from project officers about regulations, modifications and potential use of CETA, even within the same regional office. Many CETA project directors stated a need for more on-site technical assistance in program management, accounting, and development and not just monitoring. In cases where project officers had provided analysis of the tribe's program, either fiscally or programmatically, many of the recommended changes were implemented to the satisfaction of the tribes and the project officer.

This request for more on-site technical assistance is also matched by a request for more relevant training opportunities for CETA directors and staff. As CETA staff develop more sophistication through management of expanding CETA programs, concurrent with tribal expansion and increasing complexity of tribal operations, many CETA directors feel their project officers do not have the expertise, which can often only be developed by running a CETA program, to provide more advanced training. Outside trainers were sometimes thought to be very useful, but many tribes expressed the desire to receive training from other experienced prime sponsors or to select their own trainers. This is primarily important in the areas of management and program development, especially with respect to economic development.

Many tribes receive positions from Balance of State (BOS) or other prime sponsors, but many do not even though tribal populations are included in the BOS or other applications for funding. A number of tribes asked URSA/DKA to request DINAP project officers to assist them in tapping this resource.

PROBLEMS OF ECONOMIC DEVELOPMENT SUPPORT

Support of Indian reservations, especially economic development support, has in many cases created more problems than it has resolved. It could be said that, for the most part, fund sources have experienced the same type of difficulty through the funding of Indian programs as the Indians have had in administering them. For example, the administrative responsibilities of the Division of Indian and Native American Programs of DOL have expanded from $76 million to over $200 million in FY 1978. This increase was absorbed without any appreciable increase in support staff. EDA funding of Indian reservations has expanded dramatically in the type of programs funded since 1972 without any real increase in staff to administer the program. PL 93-638 contracting has not been understood adequately by BIA and IHS program staff with the result being, in some cases, resistance to reservation contracting and a lack of adequate support. Some of the direct problems such confusion has caused include:

- Gaps in Funding Support
- Inconsistent and Unrealistic Federal Expectations
- A Lack of Coordination and Cooperation Among Agencies

Each of these is discussed below.

Gaps in Funding Support

While much money is made available to Indian reservations in the form of categorical grants, the problems of the specialized grant-in-aid system are exacerbated on reservations. Reservations faced with a need to support administrative structures without a general property tax base must scour the Catalogue of Federal Assistance to meet their needs. The case of planning funding mentioned above is a good example.

It is also true in the case of much needed technical assistance. While support for managers is not normally available, neither is there adequate technical assistance provided to develop managers. Technical assistance is often provided by consultants on a contract basis. Such consultants often

have little time to familiarize themselves with the situation on-site, are given too little time to perform their work, and often are themselves over-committed. The assistance received is often uneven and inconsistent; however, several reservations surveyed have had excellent experiences.

The problem is exacerbated by the fact that technical assistance is needed in many areas and the assistance available is quite limited, when it is available at all. Often one agency will provide it for its programs but not for others. This is a problem faced by all levels of government but it is extremely critical for the resource-poor reservations.

Another gap in support is centered in the widespread failure of federal agencies to provide assistance to reservations in the area of resource identification. A necessary prelude to a comprehensive approach to economic development lies in a knowledge of the reservation resource base. Only with such a knowledge can the potentials for and constraints upon development be analyzed and planned. Unfortunately, many tribes, including eleven of the twenty-five surveyed, expressed a concern about the general lack of adequate information on their resource base. Evidently this is especially true in cases where leases have been let to energy companies who have performed their own exploratory studies but not shared the information with the tribes. Of the reservations surveyed, only one, Wind River, had the funds to hire a resource development consultant to assist in the planning and leasing activities.

Where funds are available in a given area they are often inadequate for the job at hand. This is often most critical in economic development projects such as timber or agricultural operations where funding limits require the splitting of grants into phases. The problem arises when a project must be completed prior to becoming a viable competitive entity. This is true of numerous enterprises, perhaps most significantly the Indian Industrial Parks funded by EDA in the late sixties and early seventies. In many cases, these parks could not offer adequate amenities such as buildings or warehouses to prospective industries to attract them to locate. Recent EDA and NAESP

efforts to provide support for the improvement of industrial parks at Papago, Arizona and Oneida, Wisconsin should help to alleviate the problems there.

The type of support often presents a problem. Certain enterprises require costly equipment. Such equipment can be secured from government surplus. However, securing maintenance-free equipment is impossible and while maintenance men are often supported through CETA, money for parts is unavailable. Hence generators and cold storage facilities lay unused (especially in Alaska) due to inadequate fund support in key areas.

This underscores the critical issue of economic development on reservations--the lack of venture capital and the inability of tribes to secure an adequate line of credit from private lending institutions. Those tribes with established lines of credit can see projects through to completion; those without have great difficulties.

Inconsistent and Unrealistic Federal Expectations

The expanded support that numerous agencies which fund Indian reservations have provided in the past few years has at times been administered inconsistently and, to some reservations, unfairly. One complaint often heard is that there is a lack of continuity in program administration. Federal representatives are continually being reassigned, the result being that reservation program staffs are continually being asked to shift their mode of operation to accommodate the new federal representative. The problem extends to the interpretation of regulations in the manner in which applications are prepared or structured, the monitoring or audit functions are conducted, or the actual eligibility of certain key projects under certain fund programs.

In some instances federal programs are administered without any regard for the realities of reservation life. For example, Farmer's Home Administration funds are available for home loans, facilities loans and land acquisition. However, few reservations are able to secure FmHA support due to the requirement that the land be mortgaged. Trust land cannot be mortgaged. Warm

Springs, Oregon got around the regulations by putting up other tribal resources to secure the loan; less affluent reservations could not.

The time it takes to fund a project can be a burden. HUD Indian housing projects take considerable time, often several years, to be completed. In EDA the process is more uneven. Conventional Public Works projects or Title IX and X projects require feasibility studies (often more than one), while LPW Rounds I and II funds were allocated and construction was to begin within 90 days. In isolated locales such as upper Minnesota or Alaska this requirement has been a problem.

Often these problems stem from the fact that federal programs are rarely structured to meet the unique needs and limitations confronting the majority of Indian reservations. Rather, a section establishing the eligibility of Indian reservations for support is included in the broader piece of legislation authorizing the federal grant program. Even in those instances where Indian programs are established administratively, such as the HUD Indian CDBG set-aside, problems can ensue. (See Planning, above.)

Lack of Coordination and Cooperation Among Agencies

Indian economic and community development projects suffer from a lack of intra- and inter-agency cooperation and coordination. Examples of the lack of internal consistency within agencies are many. Reservation EDA planners cite numerous instances where there is a breakdown from the EDR to the regional office. Regional office staff are often unfamiliar with and unsympathetic to the problems of reservations while individual EDRs are seen as vital technical assistance providers and advocates for reservation projects. The BIA area office can and often does upset the good will established by the most sensitive and progressive agency superintendent. The log jam may be the Area Office Director or it may just be the Property and Supply Division.

Often Washington is unaware of what is happening and the regions are not adequately apprised of Washington's intention. In HUD the CDBG Indian set-aside is currently being administered by the regions in a potentially

independent manner. Washington to date has not coordinated the effort. In short, no real overall development or support strategy characterizes the response of individual federal agencies to their Indian grantees.

Examples of inter-agency coordination are even rarer. It is not uncommon for reservations to face multiple demands for reports, evaluations, fiscal accounting, letters of credit, audits, etc. Funding cycles vary, and fund availability rarely allows reservations to launch integrated projects. For example, water and sewer facilities must be developed for most reservation developments because reservations are chronically deficient in available public facilities. IHS has traditionally had responsibility for setting up and maintaining such facilities (maintenance and construction are often now contracted for under PL 93-638.)

The funding process of IHS requires considerable lead time to support a project. Under projects such as EDA's LPW sufficient lead time is often not available, forcing the reservation to apply for either a higher amount (which may be rejected) or scrapping the project altogether. Also, the problem of one-year funding cycles often plays havoc with the demands for longer term efforts. (EDA's Comprehensive Economic Development Strategy (CEDS) program may be helpful to reservations in allowing for a more holistic approach to development, but other agencies are not as responsive.)

Even where considerable attempts to coordinate efforts on an inter-agency level are launched, they may be unsuccessful. Consider the Joint Funding Simplification Act experience. PL 93-510, the Joint Funding Simplification Act was passed in 1974. Its purpose is to enable local governments "to use Federal assistance more effectively and efficiently and to adapt that assistance more readily to their particular need by "... drawing upon resources available from more than one Federal agency, program or appropriation." "Joint funding" is the process through which local governments, including Indian tribes, receive assistance from two or more federal and/or state agencies while going through only one consolidated funding process. This means a tribe need prepare only one comprehensive application for project funding.

The agencies which are possible joint funding sources include: Interior (BIA), HUD, OMB, Agriculture, Justice (LEAA), Civil Service Commission, HEW (ANA), and Labor. Applications are submitted by tribes to their Federal Regional Council which is composed of representatives from the above agencies. One of the agencies is designated as a lead agency.

Joint funding offers many advantages to tribes. These include:

- one letter of credit for all programs
- one common fiscal year
- one consolidated report for all programs
- one single audit for all programs
- one evaluation for all programs
- allows policy makers to monitor programs more closely
- gives policy makers more time for other responsibilities
- requires comprehensive planning
- device for obtaining more services
- device for changing methods of services
- causes federal agencies to work together

Although the Joint Funding Simplification Act is law and is particularly relevant to the funding and assistance needs of Native Americans, the joint funding process has not been widely used by tribes. The Pima Maricopa of Salt River in Arizona developed a highly sophisticated planning and application process, but experienced little increase in project coordination or funding support by federal agencies. Although the tribe's internal planning and coordination was considerably enhanced, they questioned the expenditure of so much staff time and resources to develop an integrated grant application. Some federal agencies in Region IX, including EDA and DOL, refused to even review the integrated grant application.

The final result of Salt River's $8 million JFSA application in FY 1978 was to receive a reduction in ANA support from the previous year. No other funding was received. The problems identified by the tribe include:

- decision makers who could commit funds were not included in the process;
- key agencies, such as EDA, would not participate;
- agencies were unwilling to relinquish their turf to a lead agency; and
- agencies were unwilling to relinquish their review and monitoring responsibilities.

This section of the findings has described some of the key problems which the tribes surveyed during the study have experienced in their economic development efforts. Table 12 below provides a perspective on the extent to which such problems were observed.

TABLE 12

PROBLEMS OF ECONOMIC DEVELOPMENT

TRIBES/POPULATION	• Lack of federal Agency Coordination	--Gaps in funding	--Duplication of effort	--Non-availability of venture capital	--Non-availability of technical assistance	--Difficulty in linking funding sources together	--Different regulations/reporting/fiscal requirements	• Limited funding resources	--Inability to secure private funding (local banks, etc.)	--Funding too high or too low for tribal priorities	--Past funding reflects agency, not tribal, priorities	• Inaccessibility of data on resource base	• Lack of sensitivity to Indian issues on the part of area, regional, local staff	• Backlash/local environment/legal disputes
<1,000	2	3	0	6	6	4	1	6	5	3	4	0	5	5
1,000 - 3,000	5	4	2	5	6	5	4	5	6	6	3	4	6	4
3,000 - 5,000	2	3	0	3	3	2	3	3	3	2	0	2	2	3
5,000 - 10,000	4	4	0	4	4	3	3	4	4	3	2	4	2	3
>10,000	4	4	0	3	4	3	3	4	3	1	2	4	3	3
TOTAL	17	18	2	21	23	17	14	22	21	15	11	14	18	18

EXEMPLARY PROGRAM ELEMENTS

In addition to the identification and documentation of linkages between CETA and economic development, the contract calls for the identification of notable approaches to linking CETA plans with reservation OEDPs. As mentioned in the Description of Project Activities section and elsewhere above, the study team found early on that planning activities were constrained by a lack of adequate statistical information, that on-going planning was not always possible given the responsibilities of tribal planners, that CETA planning was tied to program development and yearly CETA allocations, and that OEDP preparation was only one element of the economic development process. More importantly, the time involved in economic development planning from the application through funding often was so lengthy as to obscure the manpower planning activities that could support it. Hence, the study team began to focus upon other exemplary elements of CETA which support economic development, including the activities of local manpower councils in the development of Title VI projects and the NAESP planning and project development activities undertaken to support economic development enterprises on reservations.

In examining the 25 reservation-based programs, we have identified nine programs with exemplary elements which may be worthy of replication elsewhere. The process of documenting these elements will involve further investigation in Phase II, but we have provided discussions of the exemplary elements below. It is necessary to discuss the process of selection which the study team worked through. First, as the field trip reports suggested, field efforts focused on all elements of reservation economic and community development. In order for a CETA element to be deemed exemplary, it was felt that a link to planning development should be broad enough to warrant replication by other prime sponsors and generalizable to more than one setting.

Second, the study team identified replicable elements which would not encompass the entire CETA planning or operational process. Third, the study team tried to focus on the size of the prime sponsor and its status as a consortium member, consortium prime sponsor, or independent prime sponsor. This

also would tend to focus on the replicability potential of the given element--an elaborate system developed by a large reservation would be impossible to replicate on a small reservation and vice versa.

The exemplary elements identified by the study team for discussion with DINAP and potential further documentation and validation in Phase II include:

Reservation	Prime	Element
Spokane	EWIC	CETA and NAESP planning process
Fort Peck	Tribal Executive Board	CETA coordination with other agencies
Passamaquoddy	Tribal Governors, Inc.	Fiscal and enrollment documents
Hannahville	ITC of Michigan, Inc.	Consortium planning process and coordination; centralized fund accounting system
Craig	CCTH	Planning session for community organizations, linkages with companion non-profits and departments
Fort Hall	IITPB, Inc. (Tribal Council, 1979)	Manpower planning council, planning and project linkages
Oneida	Tribal Council	Reservation population and employment survey
Papago	Tribal Council	District planning, orientation process, inter-tribal CETA advocacy
Salt River	Tribal Council	Integrated planning process

EXEMPLARY DISCUSSIONS

Tribe:	Spokane
Prime Sponsor:	Eastern Washington Indian Consortium (EWIC)
Population:	Consortium Service Area--13,960; Tribe--1,500
Land Base:	Tribe received $6.7 million in 1967 for land claims settlement
Tribal Land:	133,039 acres
Geographic Region:	Region X
Program Elements:	CETA Planning Process and NAESP Planning Process

Description of Exemplary Characteristics

Organized planning and economic development efforts have been underway at Spokane for almost eleven years. In 1967 the tribe was awarded a $6.7 million land claims settlemt, which has been used for a land purchase program, tribal investments (especially in timber), scholarship program, and tribal credit program. The settlement gave the Tribal Council and staff confidence in the future of the reservation, and the Tribal Council became full-time paid positions, expanding from three to five members as the work load increased, due to tribal expansion and development. Today there is an Executive Director, who is assigned several areas by the Tribal Council, including most tribal government departments. He reports to the Tribal Council and works with planners and department managers. The council members each have specific areas of responsibility, such as health, timber, etc., as well as overall management of all tribal activities. As the tribe has expanded, management expertise has been developed through tribal expenditures on education, scholarship programs and business training, supplemented by CETA and the Indian Action Team.

Planning at Spokane is characterized by strong interaction between departments and the Tribal Council. The Planning Office has a Planning Director who has been at Spokane for eight years, an assistant planner and a CETA trainee. In addition to EDA-related planning activities, the planners act as a support to other departments who do not have planning capacity, writing narratives and serving as information sources. The planner has daily interaction with the Tribal Council and there is a mutual interchange of information. The prime sponsor, Eastern Washington Indian Consortium (EWIC), is

administrative and reporting arm of the CETA program serving the four member tribes. EWIC's line of authority rests with the eight-person Board of Directors comprised of an equal representation of two members from each of the four Tribal Councils. (One tribe substantially larger than the others is withdrawing in October, and will become a prime sponsor.)

Since its inception in 1974, EWIC has worked to create a strong cooperative relationships among the tribes, which affects many areas of pan-tribal development. The Consortium Board of Directors does not allocate funds to each tribe based on the DOL fact sheet, but rather through a cooperative process determines the allocation based on the need of each tribe compared to other member activities. Each tribe has a CETA representative on-site who does outreach, intake, placement, etc., and who acts as a liaison with the Tribal Council. EWIC also has a research director who works with the Board of Directors and individual tribal planners, seeking funds from other sources of funding and linking CETA with economic development planning.

CETA planning starts when DOL announces the CETA allocations. The EWIC Board of Directors allocates funding as described above, and the EWIC Executive Director then meets with each Tribal Council for a planning session. The Councils meet with their department heads and tribal CETA representative to define and prioritize their needs based on the EWIC allocation. Every CETA Title planned for is a concentrated effort to see where needs match up and to link CETA to the OEDP planning process, with the ultimate goal of working trainees into permanent unsubsidized employment positions.

EWIC is beginning to emphasize both short- and long-term planning and provides as much staff support as needed to each member tribe. At Spokane, after the Tribal Council sets priorities, the CETA representative interviews prospective trainees and the Tribal Council does the hiring based on staff recommendation. CETA positions and trainee progress are tracked very closely. Efforts are constantly geared toward tying CETA training positions into major tribal development efforts, such as agriculture, road construction, and mining. Many positions are utilized at the job site, and the tribe has tried to link its two manpower programs, CETA and Indian Action

Team, as much as possible, especially with IAT stipends and supportive services. CETA also links up with other departments to provide supportive services as necessary.

Spokane received a $105,982 FY 1977 NAESP grant for agricultural management training and employment. This grant links CETA explicitly to the reservation's top OEDP priority, agricultural development, which is currently funded by EDA, and also the Bureau of Reclamation which is providing $6.2 million for an irrigation system. CETA trainees are being used on the construction of this irrigation system. This project is also linked to the BIA, the Indian Action Team Carpentry Program, the Tribal Learning Center, Washington State University, and the Stevens County Extension Service.

Planning for the NAESP was similar to the normal planning process. In this case the EWIC Research Director met with each Tribal Council and explained the program, then met with department managers (line chiefs), discussing what could be done and how it would benefit total tribe efforts. Ideas were brought to the Tribal Council and prioritized. Agriculture was a natural for Spokane since their agricultural project had been a priority for so long. The EWIC Research Director met with the Tribal Council, the Tribal Planner, the CETA representative and the Farm Director and subsequently wrote the narrative for NAESP.

Another exemplary program characteristic is an effort to develop in-house capability for demographic analysis. Spokane recently gave EWIC a CETA trainee to be used cooperatively in developing updated demographic statistics for use in program planning, proposals and as a basis for more accurate funding. Given the relatively simplistic method now used by the BIA to determine population and unemployment, the tribe expects this information to provide a more detailed analysis of skills, needs and a more exact statement of the unemployed.

Spokane thus has several exemplary program characteristics which are reflected in the strong linkages between CETA and economic development efforts. The existence of a full-time, paid five-member Tribal Council who are professional and have a strong sense of direction enables the tribe to pursue a consistent

path of tribal development. Continuity of lead staff in both CETA and EDA project areas has fostered and facilitated the development of linkages and a progressive planning structure, both for the tribe and for the consortium.

The position of the research director is particularly helpful for the provision of technical assistance in proposal writing, grantsmanship and tribal economic development. The existence of a staff statistician will enable more complete and accurate manpower planning to occur. This is particularly important since most funding is based on inaccurate and underestimated population and employment data, often from the previous census year.

Replicability Potential

A planning structure which includes a Research Director can be replicated by a consortium of any size or a larger tribe Prime Sponsor and is particularly effective in special program response, such as NAESP, and for general support as well. This type of position creates a specific link between CETA and economic development planning. The position of a CETA statistician, useful for both CETA and EDA-funded planning as well as overall tribal development, is also replicable by a consortium and a mid-to-large sized Tribe Prime Sponsor.

Tribe:	Fort Peck Reservation (Assiniboine and Sioux)	
Prime Sponsor:	Tribal Executive Board	
Population:	8,000 Enrollees, most of whom live on reservation (600 other Indian people on reservation also)	
Land Base:	Originally	2,094,144 acres
	Presently in Reservation Boundaries	2,093,124 " "
	Non-Indian owned --55.6%	1,162,733 " "
	Individually Indian owned--27.1%	567,320 " "
	Tribal government-owned--17.3%	362,309 " "
	Government-owned	762 " "

Trust lands were indicated by BIA to be divided in use as follows:

Used by Indians	380,981 acres
Used by Non-Indians	563,568 " "
Idle	8,733 " "

Governance Structure:	15-member Tribal Executive Board, elected biennially, with Chairman, Vice-Chairman and sergeant-at-arms elected at large.
Geographic Region:	VIII

Fort Peck is located in northeastern Montana, off the main lines of transcontinental commercial and tourist travel. Elevations range from 1,900 to 3,100 feet. There are large reserves of low-sulphur lignite, and oil and gas production from both trust and alienated lands.

Use patterns for trust land are 649,850 acres in grazing, 12,000 acres in timber, 274,166 acres of dry farming (small grains), 9,882 acres under irrigation (from a BOR project utilizing Fort Peck Reservoir on the Missouri River), 2,175 acres irrigated from private systems and 5,109 acres in non-agricultural uses.

Exemplary Elements

Three integers--CETA training, community and industrial development efforts, and conservation of land, water and minerals--focus on two goals at Fort Peck: (1) maximum development of human resources and (2) husbanding reservation assets as bases for future development.

The mechanisms are (a) intensive planning coordinated at policy, management and participant levels, (b) making maximum use of funding reservoirs, (c) utilizing combinations of the two tribes' elder statesmen, (d) hiring out-

side management when that is deemed expedient, and (e) recruiting younger tribal members who have gained experience, education and training on or off the reservation.

Innovation, experimentation, improvisation and new ideas are encouraged. Meetings of the several coordinative planning bodies are frequent and functional. Tribal Council members combine with business directors and department heads to form planning components, all contributing to a process which may be described as management by objective.

Results of such processes and collaboration are evident in the trio of plants in the industrial park, in the number and diversity of Indian entrepreneurial businesses, and in the securing of six Native American Economic Stimulus Program grants. The ESP grants are for Native American Apprenticeship Outreach, Domestic Fuel Development, Emergency Vehicle Operation, Industrial Park Management, Vietnam Veterans Training, and Paramedical/Health Training, totalling $1,035,022.

CETA Program

The CETA Employability Team, which includes the CETA Director, the CETA Program Coordinator and the chief of the Management Information System Office, is at the heart of the manpower complex, which is called the Reservation Department of Labor, since in addition to including top management of the component, its members provide the daily and formalized weekly linkages with other economic development segments of the reservation. CETA eligibles are estimated at 4,976, some 34% of whom are in the 22-45 age bracket and 25% over 45.

The Reservation Department of Labor, which operates as a unit of the Fort Peck Tribal Executive Board, coordinates with the four Economic Planning entities (the Executive Board itself; the Board's Program Committee; the Planning Center [composed of administrators of BIA, IHS, ONAP, EDA, HUD, CETA, commercial ventures, housing and chairmen of five Executive Board committees] and the Planning Commission).

The OEDP includes an explanation of interrelationships of the planning entities:

> The Tribal Executive Board and the Planning Commission have line authority over the activities of the Planning Center. The Planning Commission operates under planning authority of the Fort Peck Tribal Executive Board and is composed of the six-member Tribal Programs Committee. The Planning Commission relates as an equal and coordinates with other Planning Commissions (State, County, and City.)
>
> The Tribal Executive Board and Planning Commission have line authority over the activities of the Planning Center. The Tribal Executive Board delegates only planning authority in the Planning Commission, while retaining all other powers. The Planning Commission is viewed as "clearinghouse" for coordinating all planning on trust lands.

The Reservation Department of Labor, in addition to intensive intake, counseling, coaching, career counseling, employment counseling, college counseling, career guidance, orientation, job development, related supportive services and removal of artificial employment barriers--imposing tasks themselves--also:

- Coordinates with the Tribal Resources Training Center (funded by the Civil Service Commission), with the Bureau of Youth Services (LEAA-funded), the Department of Intergovernmental Affairs and Service (CSC), Summer Youth Recreation Programming (CSA), and the Northeastern Montana Department of Community Affairs (Title I CETA subgrantee);

- Operates on Fort Peck Reservation and non-reservation areas of Daniels, Roosevelt, Sheridan and Valley Counties;

- Assists in planning, job analysis, job restructuring, family planning services, classroom training, OJT planning, and establishment of reservation-wide personnel system with the Tribal Resources Training Center;

- Works with the Fort Peck Planning District on related socio-economic planning, with the Frazer Town Council on socio-economic planning, with the Fort Peck Tribal Law and Court Systems on program planning, establishing various technical services, assisting in operating a series of tribal media projects, including the Wolanin tribal newspaper, and planning bilingual, bicultural programs;

- Works with the Fort Peck Tribal Health Department in providing rehabilitative slots in the alcoholism and drug program;

- Assists in operation of training in building trades, using HIP and winterization program with the Fort Peck Housing Authority;

- Assists the Tribal Chairman and Council committees in special purpose programs, in technical aspects of PL 93-638 contracts, and in other planning with the Planning Commission and in special cleanups and maintenance of public grounds;

- Develops nutrition and health programs, youth tutoring programs, employability analysis and counseling, testing of enrollees, technical training and program services and related staff development in inter-agency resource allocation and utilization, development of the local Native American Talent Bank, and coordinates the Day Care program for the reservation;

- Implements in-service training for paraprofessional staffs on career development as specified in the reservation's CETA personnel policies and merit system and affirmative action plan;

- Also manages other funded programs as component operations assigned to the Tribal Council or by special requests of the grantors.

Summation

The picture at Fort Peck is of a committed, able and fully occupied CETA staff which is fully integrated into development of the reservation and its people by the process of involvement in every major administrative move.

Major focus at the reservation is expansion of productive capacity and output through improved use of land, labor, capital and technology by deliberate collaboration between CETA, tribal government and, where possible, with the private sector.

Tribe:	Passamaquoddy
Prime Sponsor:	Tribal Governors, Inc.
Population:	510, Pleasant Point 382, Indian Township
Consortium Population:	Approximately 4,000
Land Base:	Original Reservation Size--N.A.
Tribal Land	23,100 acres
Leased Land:	6,000 acres
	Currently suing the State of Maine to recover approximately 1,000,000 acres of land
Geographic Region	I
Program Element:	CETA Fiscal and Enrollment Documents

Description of Exemplary Characteristics

Tribal Governors, Inc. (TGI), is a consortium of the three Maine Indian reservations and two Indian associations. TGI has seven service delivery units (including one at each reservation) which are responsible for intake, counseling, monitoring, etc. at the local level. The planning and policy body of TGI is comprised of the governors of the five reservations and Indian associations; this board assumes a very active role in CETA planning and program integration. The board meets at least monthly, and meetings are attended by CAP directors, the acting director for TGI, program heads, planners and community members. TGI has board meetings and local community meetings when policy must be decided for projects and programs not falling within a regular schedule, such as NAESP. The CETA director does a fairly extensive analysis of local and statewide labor market and economic conditions and trends, and meets with reservation program heads, planners and the tribal governors to determine tribal needs and priorities. Through this process a CETA plan is devised and submitted to the community at the board meeting.

TGI has several instruments initiated at the request of the governors to assist in their planning, both locally and for the entire consortium. These instruments are used to track CETA financially and programmatically and are used by the local CETA staff, the governors and the Tribal Councils. They

also make the CETA program more understandable to program heads who may use CETA. CETA staff and governors of each reservation commented on the value of these instruments for monitoring and planning purposes, as well as for signaling the time to push trainees for placement either in permanent unsubsidized employment or in other government funded staff positions.

One document, the CETA fiscal report, is published weekly and lists information for each tribe or organization. Details include the amount spent that week, weeks remaining in the fiscal year, and a listing by program (with the purpose of each program outlined) of the original amount of funds available, the persons now on the program, and the total amount of funds expended to date.

Quarterly reports are produced for each program area (such as Title III, 303), showing the number of trainees, planned and cumulative for each program area (classroom training, work experience, OJT, etc.), the number of terminations, and supportive services provided.

Replicability Potential

The fiscal and enrollment documents provide current information on the CETA program which enables the local service delivery unit, CETA staff and tribal leaders to monitor the CETA program and engage in planning for both budgeting and placement on a weekly or quarterly basis rather than just annually. These documents also assist the governors in planning for the entire consortium and assist the CETA director of TGI in his overall monitoring and planning of the CETA programs. These types of instruments could be used by a local Prime Sponsor or a consortium to assist in the maintenance of an on-going program.

Tribe:	Hannahville (Potawatomi)
Prime Sponsor:	Inter-Tribal Council of Michigan, Inc. (ITCM)
Population:	232
Population Service Area for ITCM:	Approximately 2,000
Land Base:	The Potawatomis are not originally from Michigan and are awaiting a land claims settlement
Tribal Land:	3,400 Acres
Allotted Land:	300 acres
Geographic Region:	V
Program Elements:	Consortium planning process and program coordination; centralized fund accounting system

Description of Exemplary Characteristics

Inter-Tribal Council of Michigan, Inc. (ITCM) is the administrative unit of the four federally-recognized Indian reservations in Michigan. Because the tribes are small with very limited economic and land resources, the intent of organizing ITCM was to have most reservation activities and programs combined under one central office. The Departments of the Interior (BIA/IAT), Energy, and the Community Services Administration funnel grant money to ITCM through the Michigan Community Action Association. State and federal Department of Labor funds go directly to ITCM. ITCM is also the recipient of EDA's planning grant; EDA and HUD project monies go directly to the tribes.

The coordinative activities of ITCM provide the CETA program with support from BIA Training and Employment Assistance, an Indian Action Team, the ITCM Social Services Program (health, food and nutrition, etc.), and EDA-funded planning. All activities and programs are thus combined under one central office.

The Manpower Specialist (CETA Director) is responsible for all CETA program activities. The Board of Directors is responsible for setting program policy. The 20-member board is composed of four Tribal Council members and the Tribal Chairperson from each of the four reservations. When an allocation is made, the Manpower Specialist meets with each Tribal Chairman to

discuss needs and set up priorities and projects. Each reservation Tribal Council has a meeting before the full board meeting, which is held two to three weeks after the allocations are announced, wherein each tribe determines its priorities; tribal representatives then convey their recommendations to the full board. In the interim, the Manpower Specialist formulates alternative overall and title-related activity plans. The full board meeting is the forum where each reservation's priorities and alternative plans are considered and an overall plan decided upon and finalized.

There are four work-site coordinators, one for each reservation. The coordinator monitors work sites, logs trainee activities and does time sheets. ITCM handles all fiscal management. The coordinator works closely with all program directors, both to monitor trainees and to identify and develop work opportunities. ITCM CETA staff visits all the reservations frequently, providing on-site technical assistance and supervision as needed. The ITCM Manpower Specialist submits an overall evaluation of each CETA program to the Board of Directors every three months. The ITCM work experience coordinator does the intake and all clerical work for the trainees selected by the tribes.

On the reservation, the Tribal Council determines priorities for project and job positions. Department heads and members of the Tribal Council participate in the actual selection of trainees. An effort is made to place those with the greatest need, given tribal priorities. Due to general low-level economic bases and limited resources, priorities are to establish training positions for potentially self-supporting enterprises.

The CETA planning and allocation process seems to work to the satisfaction of all involved. ITCM staff spends a lot of time in the field and additionally offers the advantage of coordinating resources through various programs to support CETA trainees. The Manpower Specialist and Director of Social Services at ITCM work together to assist the tribes with preparation of budgets for their proposals. Planning in all program areas is facilitated

by the informal links among tribal members. The CETA Director has been with the program for four years; his accounting background has been particularly helpful, both in assisting the tribes to prepare other proposals and in understanding the fiscal intricacies of the CETA program.

ITCM has a centralized fund accounting system with a federally-approved indirect cost rate (of 21%) allowing for good internal program coordination and management, alleviating the complaint many tribes have concerning the necessity to have separate program accounting and reporting to meet the requirements of various federal agencies. This system, while complex, gives ITCM much more flexibility. ITCM has already illustrated the use of the system to other prime sponsor and other agencies.

Replicability Potential

This process can be replicated by other consortia who serve a number of small and administratively/economically resource-limited reservations and who administer other programs, along with CETA, which can provide supportive social services and planning capabilities. The internal structure of ITCM, both by department and by its centralized fund accounting system, leads to a high level of coordination and maximization of resources within ITCM and at the reservation. Such structure, complemented by the fiscal background and experience of the Manpower Specialist, permits a continuous and varied level of technical assistance to be rendered to the tribes.

The centralized fund accounting system could be replicated by any prime sponsor, whether a tribe or a consortium of tribes. In fact, many other agencies and prime sponsors have sought assistance from ITCM in setting up such a system, which illustrates the potential of prime sponsors to provide peer group training in areas of proven experience.

Alaska Native Community: Craig

Prime Sponsor:	Central Council of the Tlingit and Haida (CCTH) Southeast Region
Population:	Craig - 260 Service Population for CCTH - 15,389
Land Base:	Under Alaska Native Claims Settlement Act (ANCSA), the Regional For-Profit Corporation, Sealaska, will receive over 200,000 acres; each Native community, through its for-profit village corporation, will receive 23,040 acres of land (of which 1,280 acres is to be transferred to the municipality for general usage). Despite settlement in 1971, most land has yet to be conveyed. Cash payments for lands not returned have also been conveyed to the regional and village for-profit corporations. The regions have established non-profit corporations to handle human resource activities. These regional non-profit corporations are eligible recipients of government funding. At the community level, the IRS Council is the designated EDA/BIA target organization for Native American program funding.
Geographic Region:	X
Program Elements:	Prime Sponsor Planning Session for community organizations; linkages with companion non-profit corporations and departments; NAESP Round I planning and project administration for paramedical training.

Description of Exemplary Characteristics

The non-profit Southeast Regional Central Council of the Tlingit and Haida (CCTH) and other separately incorporated but cooperative non-profit bodies serve the social needs of the region's fifteen rural communities and five urban Native communities. The population of most of the rural communities is predominantly Native Alaskan. CCTH's manpower division administers the CETA program; the Division of Economic and Social Development (DESD) is the recipient of EDA's planning grant for the Southeast Region; and the Southeast Agency primarily administers BIA contracts for the region's communities. The Tlingit and Haida Regional Housing Authority (HA), the Southeast Alaska Regional Health Corporation (SEARHC), and the Tlingit and Haida Fisheries Development Corporation are separately incorporated but closely linked to CCTH, especially in their utilization of CETA; the latter two corporations are administering three NAESP grants.

The village of Craig illustrates the difficulties of planning and linking CETA to economic development. Villages are accessible only by air or by water, and access is uncertain during winter months. Employment is very seasonal; most villages are small, isolated, and lacking in most community infrastructure or potential training sites. In most villages, the administrative, managerial and financial expertise required to link for-profit (land-based) and non-profit (government-funded) resources and undertake economic development is in short supply, especially for communities until recently dominated by a subsistence mode of lifestyle.

In spite of these constraints and conflicts, CCTH has developed and is continually refining an outreach and community participatory approach to servicing twenty geographically dispersed communities, both through placement of trainees directly in communities and through allocation of slots to other CCTH departments and affiliated non-profit corporations.

Local community participation in CETA planning is as follows: CCTH uses the administrative portion of the CETA allocation every time there is a grant award to invite community-based organization representatives to come to Juneau for a two-day orientation and planning workshop session. Representatives include members of Tlingit and Haida Community Councils, IRA Councils, Alaska Native Brotherhoods and Sisterhoods, other local organizations, and mayors. CCTH staff lead discussion groups, covering assigned topics; alternative project and funding parameters are presented and the community representatives finalize their program activities and priorities after they return to their communities. Some communities have difficulty putting their CETA proposals (actually a workplan) together after a workshop session, so CCTH sends out program staff to assist them. CCTH staff used OEDPs to aid in their local planning efforts. When in the communities, they meet with various local groups, assess their needs and try to coordinate needs and program efforts.

CCTH manpower staff apprises other departments and agencies of CETA allocations and special programs, such as NAESP. CETA support of these agencies

permits outreach, liaison, and development of local capacity in the areas of planning, health care, housing, and future fisheries and timber-related activities.

In FY 1977, Phase I of the Department of Economic and Social Development's (DESD) operations consisted of a field operations manager and a research assistant, working with twelve Native community advocates. The staff recruited, organized and trained the community advocates to work in each community as a link between the communities and DESD. After their training phase, advocates were responsible for gathering data and working with the community on local analysis, planning, implementation and delivery of services. Most of the community advocates were funded by CCTH's CETA Title VI program, and some were funded by ACTION. Other program funding support for this phase came from ANA and BIA.

Phase II was handled by DESD's EDA-funded planning director, who provided on-site technical assistance to Native communities, primarily instruction in basic planning stages and the preparation of OEDPs. She also began to work with Native communities in urban areas (where Natives are a minority population) to set up Native planning committees to advocate for recognition of Native needs.

The limited DESD planning staff and the isolation and large number of communities to service has made the field operations component (community advocates) essential for maintaining a link between DESD and the communities. The planning director goes into the field to monitor activities and stimulate program integration at the local level. DESD is trying to direct coordinative efforts through the IRA Council; success varies locally and is strongly dependent on leadership and the local OEDP process. The OEDP committee is the focal point for tying all programs together, through representation of various groups on the OEDP committee. This is especially true as EDA-funded planning for Native communities in Alaska differs from that which occurs on reservations where the "unit of local government" is the tribe; in Alaska non-Natives live in Native communities and are often directly associated with Native economic development efforts. Thus, DEDS's

assistance to a Native Alaska community includes planning for the community as a whole, linking the IRA Council, the chapters of the Alaska Native Brotherhood and Sisterhood, the Tlingit and Haida Council, the health councils, the Johnson-O'Malley Council, the village for-profit corporations, and the municipal government.

From the perspective of DESD, many local people have been trained and are in place on community OEDP committees. Staff will put future emphasis on analysis of local development issues, strategies for development, grantsmanship, etc. In the coming fiscal year, communities can decide whether they want a field person, or wish instead to tie directly into a training program to be implemented by DESD. This program is being developed with the State of Alaska and will hook into CETA Title III for training funds. Another thrust of DESD will be to build up organizing and training capacities and link into other agencies more effectively.

The success of this approach was visible in Craig during the past year. Supervised by the president of the IRA Council, Craig's community advocate was a very dynamic person who was exceptionally good in her role as liaison between the municipality and the Native community. As an OEDP committee member, she was instrumental in the preparation of the OEDP.

The Southeast Alaska Regional Health Corporation (SEARHC) had 18 CETA positions; nine were used for trainees in accounting, clerical/typing areas, health data analyses, and technicians; nine others served as outreach workers in seven communities, providing basic medical care to remote areas. Many of the local trainees were able to upgrade their skills in emergency medical training and alcoholism counseling through NAESP. SEARHC is beginning a planning effort and has used OEDPs for health planning and preparation of its NAESP proposal.

The Tlingit and Haida Regional Housing Authority (HA) has used CETA trainees for a long time in various areas. HA has utilized CETA for staff training and many trainees have assumed permanent positions; in many cases the usefulness of the CETA trainees demonstrated the need for a permanent position,

with increased funding being provided by HUD once the position was established. Permanent placements include two clerk/typist trainees who have moved up to positions as a housing counselor and as a Section 8 rental assistant. Many of the HA's housing projects have CETA trainees providing management and maintenance, which is the only way the HA can provide essential services. CCTH has reserved several CETA positions for the HA to use as on-site management and maintenance staff for the HA's elderly housing projects (105 units to be built in several different communities). The HA uses many Native Alaskans during construction of projects and has used CETA trainees under the force account rehabilitation project. Ketchikan, one of the urban communities, has a CETA construction crew working under the BIA Housing Improvement Program (HIP) and the CSA weatherization program.

CCTH applied for and received four NAESP grants. The proposal awarded in Round I for paramedical training was prepared by SEARHC upon notification of NAESP by the CETA director. SEARHC provides direct services to 15 rural villages under contract to IHS through community health aides, many of them funded through CETA. Through this contract, SEARHC had identified an extreme need for more services and upgraded training in rural areas. During an intensive two-day planning session, the president, executive director, field coordinator for the Health Aide Program, the EMS coordinator and the IHS coordinator worked on recommendations for each program area. Recommendations and work plans were compiled and refined and a narrative written. As the program got under way, training was monitored and adapted to fit needs not clearly identified during the initial planning process.

SEARHC has a newsletter which details service delivery and other agency activities; the several items relating to NAESP were excellent for disseminating information about the paramedical grant.

The three Round II NAESP proposals were prepared by the CETA director. The fisheries and timber projects were long-standing and well-defined needs. The CETA director met with staff of Sealasla to structure the timber program; after the fisheries proposal was written, the CETA director consulted with

the Central Council Director of Fisheries and Timber who agreed to do the training for both programs. Tourism has also been identified as a development potential for both village and regional corporations, thus the rationale for a hotel/motel training program to be attended by trainees from villages which have under construction or are planning a hotel/motel project.

Replicability Potential

There are several elements of the CCTH program which can be replicated by other Alaska Native non-profit regional corporations, and by other consortia in some cases. The initial two-day CETA planning and training session for local program administrators and potential user organizations is especially good for consortium prime sponsors having a very geographically dispersed service area comprised of many small villages.

Alaska Native communities are unique in that non-profit social services delivery is the function of one type of organization (regional non-profit corporations and village IRA Councils), and for-profit economic development ventures are the function of another (regional and village for-profit corporations). There is thus no one tribal or Native organization able to undertake directly integrated social and economic activities. CCTH's support to and interaction with companion agencies is an exemplary linkage when CETA is utilized to fund and train local community members as outreach workers and liaisons to regional offices, especially for economic development planning and health. In this manner, CETA assists in the development of both social and economic development infrastructures at the local level.

CCTH's NAESP planning and program follow-up process for the Round I paramedical grant especially is exemplary and can be replicated by both Alaska Native and other consortium prime sponsors.

Tribe:	Shoshone-Bannock Tribes, Fort Hall
Prime Sponsor:	Idaho Inter-Tribal Policy Board, Inc.
Population:	3,113
Land Base:	Tribal Land--523,204 acres Allotted Land--N.A., although amount is substantial
Geographic Region:	X
Program Elements:	Manpower Planning Council, Planning and Project Linkages

Description of Exemplary Characteristics

The Fort Hall CETA program by and large operates independently of the prime sponsor. The tribes are attempting to obtain prime sponsorship status for their CETA program. The Shoshone-Bannock Tribes, Inc. reorganized their management structure in 1975. Currently, the Fort Hall Business Council--seven members selected from the five reservation districts--is assisted by three tribal employees (the economic planner, the contracting officer, and the financial manager). These three men also serve as technical resources to the directors of the tribal departments and programs of law and order, education, health and welfare, land use, Indian Action Team, CETA (employment and training) and credit. Organizationally, the structure is divided into human resources, natural resources, and economic development. The tribal enterprises of agriculture, the Smoke Shop, and the recently-completed trading post are run by managers who also are supported by the "technical resource team." The contracts officer serves as the granstman for the tribes' department directors. As such, he assists the departments of education, health and welfare, and law and order. (He is a resource to CETA if and when the need arises.)

The CETA director is supported by two outreach worker/job developers, a statistician, a youth coordinator, and a secretary. A planning committee made up of the CETA director, BIA employment assistance officer, director of the manpower planning Indian Action Team, and the education director assumes the major manpower planning and placement functions of the program. The manpower planning committee meets weekly to discuss staffing requests submitted by tribal departments and enterprises. After a position is identified and verified by the committee, a two-week announcement period is

provided for eligible persons to apply. The committee then screens and makes the final selection decision. (This process differs from the normal tribal government procedure, which has the Tribal Council making all final selections.)

The committee's modus operandi is exemplary in that it concerns itself with long-term employment issues, such as the need to provide PSE slots to tribal enterprises when they become operative, and the need to support tribal departments as they assume more service responsibilities. The committee deals with issues that concern BIA employment assistance and the Indian Action Team as well as CETA. The staff of these three programs work together beyond the confines of the committee. The close working relationships have provided an excellent opportunity for integrated manpower development.

An additional planning resource is provided through the meetings, held at least quarterly, of the Fort Hall Planning Council, the local planning body for Idaho Inter-Tribal Policy Board, Inc. Council members include the CETA Director, the BIA employment assistance director, the education planner, the Tribal Chairman (or Tribal Council member), the tribal education committee chairperson, the economic development planner, and the financial manager.

CETA is vital to the expansion and consolidation of the Shoshone-Bannock Tribes, Inc. institutional structure, and has been particularly important to tribal law enforcement andhealth and welfare. CETA is also directly linked to Fort Hall's EDA-funded agriculture and livestock projects, a top tribal development priority. A particularly noteworthy example of program integration is seen in the development of the tribal and BIA-funded Smoke Shop and trading post.

The trading post (market, Smoke Shop, retail outlet) is unique in that it was constructed entirely by the Indian Action Team. The success of the Action Team is expected to promote further tribally-based construction efforts in the future. CETA classroom training is provided Indian Action Team participants in GED, blueprint reading, and general construction techniques. CETA Titles III and VI enrollees are programmed for the tribal trading post commercial enterprise once it becomes operative.

Replicability Potential

A manpower planning committee comprised of those involved in tribal training and education, and oriented to linking CETA to ongoing and future project development planning--a formal manpower planning process--is replicable on a mid-to-large-size reservation, which is fairly complex organizationally. This kind of planning integration between CETA and economic development fosters integration in project funding and implementation, and maximizes training resources.

Tribe:	Oneida Indian Tribe of Wisconsin
Prime Sponsor:	Oneida Tribal Council
Population:	2504
Land Base:	500 acres allotted 2,100 acres tribal
Geographic Region:	V
Program Element:	Manpower Survey

Description of Exemplary Characteristics

The Oneida tribe of Wisconsin is faced with a relatively small amount of tribal land and is thus constrained from developing economically. The population and employment has been fluctuating, and there is no clear way of maintaining an adequate data base without information.

The tribe is attempting to set up a planning commission to handle land use issues, to restrict development where possible, and to promote the interests of tribal members. Recent court decisions surrounding the Oneida of New York will serve to provide support to individuals and tribal operations.

Due to the above, there was a need for an upgrading of the basic statistics and identification of the services needs of the tribal members. Accordingly, the CETA program and the tribal planning department prepared a community survey to be conducted throughout the reservation. The survey project was to be administered by the planning department and the result would be made available to all departments and to the CETA program to assist in program development.

The CETA Director served on the OEDP committee and was therefore able to incorporate the manpower planning elements into both the OEDP and CETA plans. The survey will be instrumental in assisting any future planning or development activities. There are plans to upgrade the findings annually.

Replicability

The instrument, the process of development, survey techniques, analysis techniques, results and uses should be replicable to a wide range of prime

sponsors concerned about documenting population growth and increased need for services, skills inventory and manpower needs.

Tribe:	Papago Tribe of Arizona
Prime Sponsor:	Papago Tribal Council
Population:	16,000 (estimated)
Land Base:	2,774,370 acres--Main 71,095 acres--San Xavier (allotted) 10,409 acres--Gila Bend
Geographic Region:	IX
Exemplary Elements:	District Support Process, Participatory Orientation Process, Inter-tribal CETA Advocacy

Description of Exemplary Characteristics

The Papago CETA program received five NAESP grants which were a testimony to the innovative and creative impetus behind the program. Beyond NAESP, the program had developed a number of important linkages with the University of Arizona, the local vocational technical institutes, and the local prime sponsors.

As the field trip report noted, Papago has a governance structure similar to other large reservations such as Pine Ridge and Rosebud, South Dakota, where local districts play a significant role in tribal government. One of the major difficulties faced by these reservations is the lack of employment opportunities available, and the constant need for transportation to support any training efforts in the major service center (Sells, Pine Ridge, Rosebud).

The CETA program developed a regional allocation process which provided districts with a certain level of Title VI funds and initiated a planning process to assist in project development. Lastly, a special regional resource developer was assigned to assist the districts in implementing their programs and in obtaining needed services or equipment. This effort was cited as being instrumental in delivering jobs and resources in the areas where they were needed most.

Because of the circumstances surrounding the field trip, it was impossible to adequately track the planning process. If the exemplary element is selected, further inquiries will be made.

Another interesting element of the Papago CETA program was the planned development of an orientation process, which would better prepare CETA enrollees for their training or placement positions. Developed by the CETA program and the Tucson Skill Center, the orientation program was meant to provide a vital service that is often lacking in Title III programs. The orientation process would serve as a major diagnostic tool in assisting the program to determine the best possible placement to a given enrollee, and it was hoped that the impact of the process would be to limit turnover and promote the best interests of the enrollees.

In selecting the orientation process as exemplary, the study team is promoting a concept that, at the time of the field visit, had not yet been in operation. Should this serve as one of the exemplary elements, the study team would be in an excellent position to document the developmental process.

The final element to be offered as exemplary is critical to the relationship between urban and reservation programs. It involved the organizing of an ad hoc Indian CETA advocacy committee to lobby the local Title I prime sponsor to provide services to Indians. The process of advocacy is on-going and the results are cumulative. Some of them included the organization of reservation and urban Indians into a group that had a mutual purpose--to promote the interests of Indians, the eventual hiring of an Indian counselor by the Title I prime, and the provision of compatible services to Indians seeking CETA assistance.

The process undertaken to establish the dialogue between reservation and urban people should be critical to DINAP in promoting the best interests of urban and reservation prime sponsors. The link to the Title I prime sponsor is also important because it promotes the goals of Title III primes in obtaining other CETA funds.

Replicability Potential

Large prime sponsors with district level governmental structures might find the Papago district planning process helpful to their situations. The orien-

tation process would benefit all primes; however, replication material would have to be structured in such a way as to recognize the staff limitations of smaller tribes. The inter-tribal advocacy process would be helpful to consortium prime sponsors, reservations near urban areas, reservations with strong ties to urban areas or urban CETA programs. Such a program could go a long way in promoting the shared interests of reservation and urban people.

Tribe:	Pima-Maricopa of Salt River, Arizona
Prime Sponsor:	Salt River Pima-Maricopa Indian Community
Population:	2,260
Land Base:	49,294 acres
Geographic Region:	IX
Program Element:	Integrated Planning Process

Description of Exemplary Characteristics

Planning has become an increasingly complex and sophisticated undertaking at Salt River, and is an exemplary planning process. Salt River has a joint funding application process and is the only joint funding Indian program in Region IX.

In 1970 the community had one grant from OEO and one contract with BIA. In 1971 the General Development Plan, funded under HUD's 701 program, was the community's first professional attempt at long-range planning. The work was performed mainly by consultants. It is limited by Salt River's current standards. Also during that time the tribe hired its first planning director and began a formal Budgeting System and Capital Improvement Budget. The tribe began extensive contracting with BIA in 1968 for operating programs previously under control of BIA. When PL 93-638 funding became available the tribe quickly moved to secure funding under it. The tribe's computerized fiscal accounting system has made this transition relatively simple.

As its planning capability expanded the community desired to go beyond the year-to-year application process, so in 1973-1974 they began to integrate planning efforts and combining proposals into the Integrated Grant Application format (IGA). This process was refined in 1975, and in 1976 the planning and budget systems were integrated to tie together all program activities, including grants and contracts, into the Joint Funding Simplification Act format. The tribe also received OMB approval to establish Salt River as an A-95 clearinghouse, and established the Office of Management and Program Development (OMPD), funded by ONAP to control and monitor the total planning effort.

The joint funding process developed by Salt River was quite innovative. First, the staff from each department went through the Federal Domestic Assistance Catalogue, which provided information on program eligibility, but not the availability or likelihood of funding. (USDA has developed a computerized print-out of their and other federal programs--FIDAP--which is seen to be useful and a good thing for other agencies to duplicate. United Indian Planners has been brought into the FIDAP computer system.) Each department prepared plans for the functional areas under its control. These were integrated into an overall document which was submitted to Region IX FRC. Representatives from the Region IX FRC were invited to Salt River to review the application and to reveal what money was available. Specific project areas were developed, and the tribe held a three-day session to present their program to the federal participants in the IGA/JFSA and secure commitments for project funding.

The tribe received verbal commitments for 18 projects but in terms of actual programs only three were ultimately funded. Moreover the tribe was required to submit separate grant applications and could not rely on the IGA/JFSA process.

The tribe is now questioning the joint funding process in terms of its results vis-a-vis the regular application process. They also feel the need to have more departmental interaction to eliminate areas of overlap and perceive that the A-95 Clearinghouse review process will help in this respect. It is agreed that even if the IGA/JFSA is dropped the tribe will continue its internal planning process.

Other Planning Activities

The tribe is trying to fund a special programs person through ONAP funding who could respond to specialized RFPs.

Under HUD 701 planning funds the tribe is updating its General Development Plan. The original plan was completed about 1970. Most departments except CETA are involved. The key to the effort is to integrate the yearly coordinated planning effort with the General Development Plan.

Benefits of the IGA/JFSA Planning Process

- Fosters an excellent internal planning process that is comprehensive, links departments, and provides an overall direction for the tribe.
- Develops good contacts with agency people, increases flow of information to the tribe.
- Promotes interchange of information and interaction among federal agencies.
- Gives planners a better idea of community needs

Disadvantages of the IGA/JFSA Planning Process

- Time is spent preparing proposals without any assurance of receiving money.
- There is a lack of coordination on the part of federal agencies, who have different regulations, priorities, etc., and who require separate applications for individual projects.
- Those federal staff working on the tribal application and brought together for tribal presentations were by and large not those in a position to allocate funding.
- A number of key agencies (e.g., EDA, DOL) are absent from the IGA/JFSA process.

Replicability Potential

The Salt River Reservation is relatively small and contains a middle-sized population. However, the planning process developed on the reservation would be beneficial to reservations of all sizes. The Salt River planning efforts demonstrated that it is not necessary for a reservation government to be wealthy or large to achieve a high level of integration.

III. RECOMMENDATIONS

The findings and conclusions presented in this report represent the first phase in a multi-phased research and demonstration effort committed to the strengthening of linkages between the CETA programs and the economic development planning and programming activities on Indian reservations and Native American communities throughout the United States. Thus, the recommendations which follow constitute the first in a series of policy and program based suggestions to the Department of Labor and the Division of Indian and Native American Programs for the improvement of Indian CETA programs in general and the promotion of Indian economic development through CETA in particular.

We have chosen to present the recommendations in three parts. The first includes those which deal with the broader policy implications of the study including interdepartmental coordination and cooperation, advocacy for Indian prime sponsors, and long-range promotion of reservation-based economic development. The second series of recommendations are operational in nature and focus on suggested improvements in the operation and administration of the Indian CETA program. The final series of recommendations highlight the suggested activities that should constitute the second phase of this overall effort.

POLICY AND PROGRAM RECOMMENDATIONS

- *The close working relationship established between DINAP and the Indian Office of EDA to support this research should be fostered and extended. Care should be taken to insure that DINAP and EDA continue to share information and to work together on issues of mutual interest. A memorandum of understanding between the two agencies should be established to promote this relationship and to provide directions to reservation-based grantees to strengthen their own CETA/EDA economic development linkages.*

- *The working relationships established between DINAP and the agencies which participated in the NAESP application review process should be maintained. Since Indian CETA programs have become involved with a wide range of community economic development activities through NAESP, DINAP staff and local program staffs need to become more familiar with the wide array of federal programs which are involved in funding those activities. Accordingly, DINAP should engage in information sharing activities with other federal agencies that support Indian reservations to apprise them of the CETA program and to learn of the other funded programs which CETA funds can support.*

- *The findings of Phase I suggest that there is indeed something unique about Title III reservation prime sponsors which warrants a request to Congress for special waivers from the more onerous sections of the proposed CETA legislation. The fifteen weeks unemployment requirement of Title VI should be amended to reflect the structural unemployment problems faced by Indian reservations and the seasonal and part-time nature of much of the work available on reservations. Some way of extending the training for OJT or classroom training similar to that provided through NAESP should be requested to reflect the need of most reservations to attain a skill base and achieve community and economic infrastructures that more closely reflect the non-reservation world.*

- *DINAP should pursue its efforts to encourage private investment on reservations. In doing so, it should coordinate with the Indian Industrial Development Program of EDA, which has had considerable experience in this area.*

- *Consideration should be given to the establishment of multi-year CETA funding. The present system of year-to-year funding places constraints on any long-term coordinated manpower planning. The NAESP experience received high marks for allowing an extended grant period. A number of the problems observed during the study could be reduced if a multi-year funding system were established.*

OPERATIONAL RECOMMENDATIONS

- *DINAP should promote establishment of a newsletter that incorporates the information from DINAP bulletins, provides information on region prime sponsor organizations, reports on notable CETA program activities, and provides information on legislation or regulations to clarify issues for prime sponsors. The Indian and Native American CETA Coalition has begun such an effort but it requires support and cooperation from DINAP.*

- *DINAP central staff and project officers should be briefed on the results of Phase I and be provided materials to enable them to assist in the promotion of economic development on reservations through CETA.*

- *A limited study should be made of the NAESP process detailing the lessons to be learned from Rounds I and II, including documentation of the development of the idea, the methods of screening and project selection, and analyzing the impact of the process. A report should be prepared for dissemination to prime sponsors.*

  If possible, an evaluation of the NAESP program should be undertaken on a random sample of reservations to determine the impact of the program in the various categories and to identify areas where additional support and technical assistance is warranted.

- *Consideration should be given to providing additional project officer staff to the regions. Project officers should be provided training to help them better serve the interests of prime sponsors. If possible, functional distinction designations--fiscal officer, program officer, technical assistance/resource development officer--should be promoted, thus allowing for the development of project officer specialists and cutting down on turnover and promoting continuity.*

- *Consideration should be given to providing support to regional prime sponsor organizations. Information sharing, peer training, regional conferences, etc., should be promoted and funded. Technical assistance*

resources should be aggregated on a regional basis, and an ANA-type allotment of consultant or other technical support persondays should be considered for the distribution of those resources.

- *Key issues surrounding allowable uses of Title VI support for economic development should be decided and operationalized. Project officers should be regularly convened to be briefed on central office staff direction subsequent to any major policy decisions.*

- *There should be a means of coordinating consultant operations to DINAP. The resources of each consultant contractor should be utilized to the utmost by DINAP to improve operations and coordination. Consultants should be apprised of each others activities and be available to provide information when asked.*

- *Regional office staff should be encouraged to estaolish and maintain relationships with the regional staffs of other federal agencies serving Indian peoples. This process should include at the very least a mutual sharing of information regarding the programs and projects funded at the reservation level and general insights into the developmental activities underway on the reservations with the respective region.*

SUGGESTED ACTIVITIES FOR PHASE II

- *A full proposal detailing the tasks to be undertaken in the Phase II effort must be prepared and submitted to DINAP and OPER prior to any Phase II activities.*

- *The study team and DINAP should engage in substantive discussions to determine the focus of the exemplary program effort. Once the process is determined, TAT and project officer staff should be involved in the documentation of exemplary elements to ensure that the process will not end with the Phase II effort.*

- *The key task for Phase II should be the identification and documentation of notable methods of using CETA funds to promote reservation development.*

The notable approaches cited and described in the report should be the subject of further research to document the processes involved in their development. Where possible, DINAP central and regional staffs should be involved in the documentation effort. The end product of further research must be the production of replication materials that are relevant to a wide range of prime sponsors.

- *Consideration should be given to develop materials which would be useful in establishing manpower planners/resource mobilizers--positions which are not now routinely present on CETA staffs. Such materials would highlight the activities such persons should perform and suggest some proven techniques. The key is that on reservations job development can be job creation unless the CETA staff works closely with the persons responsible for economic and community development at the reservation level.*

- *The Phase II effort should involve the documentation of the DINAP business development initiative. The DINAP contractor should serve as a liaison between EDA and DINAP and the private sector in this effort and should document the process which evolves in the furtherance of the initiative and report on any notable approaches to business development that flow out of the initiative.*

- *All activities of Phase II should where possible involve the participation of the Indian and Native American CETA coalition and the newly-formed Regional Prime Sponsor Organizations to demonstrate the potential of these groups and to insure the widespread dissemination of Phase II products.*

IV. RESEARCH DESIGN

The methodology developed for the study was divided into three distinct areas: Site Selection, Data Collection, and Data Analysis. The methods developed followed the approach outlined and discussed in the URSA Proposal. The following is a discussion of that developmental process.

A. SITE SELECTION

In the URSA proposal site selection was identified as a critical task which would shape the entire study. URSA had proposed that the selection process be adopted which:

- reflected the priorities of USDOL;
- provided a rational basis for categorizing site eligibility; and
- highlighted a range of analytical variables to assure for later comparative analyses.

The site selection process ultimately adopted by DOL and the study team involved three steps:

- An identification by the study team of a limited group of 39 sites and the preparation of study profiles for each of the sites.
- A finalized selection meeting which involved representatives of OPER, DINAP, EDA and the study team.
- The preparation of background profiles for the final sample and the general adjustment of the final sample throughout the study.

Initial Identification

Upon contract award, the study team immediately began to identify appropriate sites for research. As stated in the URSA proposal, care was taken to

provide a mix of reservations which would constitute a representative sample in terms of population, land base, relative wealth, and culture.

In preparation for the initial orientation and site selection meeting with representatives of OPER, DINAP, and EDA, the study team made an initial independent selection of thirty-nine (39) sites to serve as a basis for subsequent discussions. Profiles were developed for each of the sites, and a package was submitted to the project officer to help focus the site selection activities.

The process adopted by the study team to select sites highlighted a number of considerations. First, the sites were selected from the lists of reservations and communities currently receiving EDA §301(b) planning grants and/or with active OEDPs. EDA had provided a list of grantees to the study team, and OPER and DINAP agreed that the list would control study site eligibility. Second, care was taken to include as broad a geographic mix as possible. The identified sites were located in 20 states from eight of the ten federal regions. Third, discussions were raised with representatives of HUD, IHS/PHS, BIA and EDA to identify sites which they perceived to be interesting to the study due to the planning capabilities, on-going ventures or activities, or progressive nature of the tribal group. Fourth, a range of sites was selected to provide interesting comparisons to the sites identified by government representatives. These were sites where skills in the planning and implementation of government programs were considered to be limited.

Finally, sites with which the study team had had experience were selected. These sites by and large also fit the other criteria for selection, but had the added advantage of affording easy field entree to the study team.

As mentioned above, once the tentative sites were identified, profiles were developed for each, detailing a number of characteristics which were thought to be critical in the final analysis. These include:

- Population. Population figures for 1960 and a more recent BIA census were identified. Significant increases in population over time were identified early on as an indication of increased activity and reservation development.

- Land and Resource Base. Land size and resource base were expected to help identify development potential to help shape issues to be addressed on site.
- Site Characteristics. The physical characteristics of the reservation were highlighted to provide a general perspective on the site, its proximity to major population centers, and the prevailing climatic conditions.
- Cultural/Historical/Sociological Information. General information detailing relative nature of lifestyle, cultural patterns, language, and history was included.
- Economics. Recent employment and unemployment figures, any special community development activities, and general employment activities were included.
- Known Ventures. Ventures that are tribal run, managed and operated by residents, etc., were identified.
- Sources of Tribal Income. Taken from Development of Indian Resources, Hough. This source was out of date, but provided some comparison to current sources and levels of income.
- Government Structure. Identified issues of organization and control.

A general profile was prepared for each of the 39 sites, including information that was available. The sources we used included BIA, HUD, DOL documents, and study team contacts in the field. These profiles, while quite basic, were helpful in developing the site baselines that were required in the overall analysis. A copy of the form used in developing site profiles is included in Appendix A of this report.

Site Selection Meeting

On January 12 and 13, 1978 the site selection meeting was held. The meeting served also as an orientation session, involved contract review and planning, and served to identify additional resource data as well. The following represents the substance of those sessions:

- Contract Review and Planning. URSA was oriented to the organizational structure of DINAP and informed of the roles DINAP staff intended to assume. An early DOL assumption that DINAP field staff would accompany the project team on every field visit was challenged when it was learned that the field staff workload was probably too great to allow for that much commitment of time to the project.

The Economic Stimulus program was discussed and it was agreed that efforts would be made to include NAESP grantees where possible in the study. The need to investigate the integration of CETA with activities on-site other than merely with the OEDP was stressed. The participants agreed that this would involve an expansion of the scope of the effort, but also agreed that the information that would flow from such investigations would assist DINAP in improving site operations.

- Identification of DOL and Other Federal Agency Background Data. EDA had provided DINAP with the copies it had of available reservation OEDPs. These OEDPs were packed and sent to URSA at the close of the meeting. CETA plan narratives were also made available to URSA. Relevant documents were provided prior to and after the meetings by both EDA and DOL. It was agreed that URSA would have to secure any additional documents from other federal agencies or on-site for those programs operating at selected sites.

- Site Selection. DINAP staff had prepared a list of potential sites prior to the meeting. The DINAP list and the study team list were compared and discussions of the appropriateness of given sites were held.

Representatives from the EDA Indian desk participated in these discussions. DINAP considerations included a desire to provide a broad geographical mix

of sites and to include consortium prime sponsors where possible. EDA's considerations were to provide a sample of sites that would represent a range of EDA planning grantees and EDA development grant areas. The final sample arrived at in this collaborative process included 13 of the sites initially identified by the study team. With regard to consortium prime sponsors, it was agreed that only one reservation per selected consortium would be studied. The following list represents the final selection of sites arrived at during the site selection process:[1]

Region I	Passamaquoddy, Maine (Pleasant Point, Indian Township)
Region IV	Choctaw, Mississippi Cherokee, North Carolina
Region V	Oneida, Wisconsin Nett Lake, Minnesota Hannahville, Michigan (Esconaba, Sault Saint Marie)
Region VI	Cherokee, Oklahoma Mescalero, New Mexico (Albuquerque, Mescalero) San Juan Pueblo, New Mexico (Albuquerque, San Juan)
Region VII	Santee, Nebraska (Santee, Winnebago)
Region VIII	Fort Peck, Montana Wind River, Wyoming Fort Berthold, North Dakota Rosebud, South Dakota Pine Ridge, South Dakota
Region IX	Hoopa, California Pyramid Lake, Nevada (Pyramid Lake, Reno) Salt River, Arizona Papago, Arizona San Carlos, Arizona

[1]Parentheses ( ) indicate sites where field trips required visits to more than one location.

Region X	Warm Springs, Oregon Spokane, Washington Lummi, Washington (Bellingham, Everett) Fort Hall, Idaho Craig, Alaska (Craig, Juneau)[2]

Profile Refinement

At the conclusion of the formalized site selection process, the study team refined and expanded the original reservation profiles. A meeting was convened to accomplish this task. In attendance were Mr. Vine Deloria, Jr., Professor of Political Science at the University of Arizona, author, and past President of the National Congress of American Indians, and Mr. Gerald Wilkinson, Executive Director of the National Indian Youth Council. At the meeting the site selection process was reviewed and each individual site was discussed. The discussions focused upon historical and cultural factors relevant to economic development, recent and current developmental activities, pending disputes and/or relevant court cases, and reservation governance structure and politics.

At the conclusion of the meeting, the original profiles were expanded and updated. The resulting profiles constituted the initial background data required for the field work activities and the end of the site selection process.

B. DATA COLLECTION

The demands of the study required the development of three distinct research methods to accomplish the three distinct data collection activities:

- Field logistics planning
- Off-site data collection
- On-site data collection

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[2]Klawock, Alaska had been identified in the site selection process, but the prime sponsor (Tlingit Haida Native Association) suggested that Craig would be more interesting for purposes of the study. Craig was visited after consultation with the Government Project Officer.

Field Logistics Planning

The demands of the study--conducting twenty-five site visits to remote Indian reservations within a limited time frame--dictated the need for formal field logistics. The critical elements to be considered included securing entree to reservations, rigid trip scheduling, and adequate feedback and reporting mechanisms. It was imperative that a logistical system be developed and tested prior to any actual field work. Accordingly, logistics were discussed at the initial orientation session.

First, the process of obtaining the cooperation and participation of sites was reviewed. It was agreed that a formal letter signed by A. McNabb, DINAP Director, would be mailed to the Tribal Chairman with copies to the CETA Director. EDA Indian Program Director Ray Tanner also agreed to have a letter go out under his name to EDA planners and Planning Directors. Letters were drafted by the study team and approved by EDA and DINAP. In order to maintain consistency in scheduling, it was agreed that signed copies and franked envelopes would be provided to the study team, which would mail letters out at the appropriate time according to the logistics plan.

Field trip scheduling was an on-going process given the problems that accompany any study that has a major field trip emphasis. Scheduling was controlled by a number of key considerations. First, the size of the reservation and its relative governmental complexity dictated in part the actual time on site which would be required. Second, travel time, especially ground transportation from airport to reservation, had to be taken into consideration in scheduling. Third, where possible, visits were to be made to two relatively close reservations to maximize contract resources. Fourth, weather was to be considered as a factor and hence field trips were to avoid the far north and east during the winter. Last, the scheduling had to be flexible enough to accommodate the wishes of the study sites. Schedules were prepared and updated monthly throughout the study. Field trip activities took approximately six and one-half months, from the last week in February through the first week in July.

The process ran smoothly, due in large part to the logistical plan developed by the project's support staff drawing on past major field experiences. The following summarizes that plan for an individual site:

- Set up tentative date for site visit. Mark date on tentative calendar only. Master Calendar is used only for confirmed dates.
- At least three weeks prior to scheduled site visit, mail out CETA/DINAP and EDA/Indian Program letters to appropriate individuals. Keep carbon of letter for verification of date and addressee. Post first mailing date on CETA Master Calendar for all site visits.
- One week after first mailing, contact site by telephone to verify receipt of letter, discuss study time requirements, and general focus. Answer all questions. Verify the date of the site visit to the satisfaction of all respondents. Be sure to contact Tribal Chairman, CETA Director, and EDA Planner to be sure everyone understands the nature of the study. Verification date and actual site visit date are to be marked on the Master Calendar.
- After the verification call (preferably the same day) prepare confirmation letters. The second mailing should be timed to arrive approximately five days prior to the site visit. The letter is to reaffirm the date of the visit, to outline the process of the field trips, identify the individuals that should be interviewed, and to answer more fully any questions raised in the telephone call.
- Conduct site visit.
- Within one week after the field trip, thank you letters should be drafted and mailed. The Tribal Chairman should receive one, as should the CETA Director. If any special information is to be sent to provide feedback to the reservation or to provide additional information to anyone who requested it, it should be sent at this time.

- Within one week after a field trip, a trip report should be prepared, following the appropriate format, and submitted to the Project Director for review and editing. All materials gathered on site are to be aggregated into the individual file kept for each study site. Raw field notes are to be reproduced and a copy placed in the site file.

Off-Site Data Collection

Due to the limited time available for on-site activities, off-site data collection was considered vital to the overall success of the study. Accordingly, a three-phased system of off-site data collection was developed to assure that the widest range of material was collected and analyzed. The system was characterized by general material gathering, individual site material gathering, and material review and analysis.

The URSA proposal highlighted the broad scope of federal grant programs which participate in Indian economic development. Throughout the course of the study, the study team was involved in the acquisition and review of written reports and files and the conduct of limited interviews with representatives of agencies involved in Indian economic development.

The subject matter involved in these literature and informational gathering activities included:[3]

- EDA. Relevant materials on Indian economic development, EDA strategies for development, interviews with EDA Indian program staff, EDA Regional Offices, EDRs.
- HUD. Relevant materials on Indian housing and the Indian Community Development Block Grant (CDBG) set-aside, interviews with HUD Regional Office staff and Economic Development Law Project staff.

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[3]See Bibliography for citations.

- USDA. Gathering of relevant materials on Indian programs.
- SBA. Gathering of relevant materials, discussions with regional and area office staff.
- Senate Select Committee on Indian Affairs. Gathering of Policy Review Commission Reports, discussions with committee staff.
- CETA. Securing DINAP and OPER reports, interviews with central and regional staffs.

The general off-site data collection activities were characterized by a rigorous document search. The consultant advisors were asked to cite relevant materials regarding Indian economic and community development in general. The study team obtained subscriptions to relevant publications including the United Indian Planners' Association Newsletter, the UIPA News, and the Center for Community Economic Development Newsletter. Copies of reports and studies, both published and unpublished, which dealt with Indian development were obtained.

Informal interviews with state and federal agency staff were characterized by an open-ended exchange of information. Care was taken to find out about application and funding processes, problems faced by reservations in dealing with the agencies and vice versa, and any specific government initiatives regarding Indian development.

Study team members were assigned to review the materials collected and to prepare abstracts. Interviews were written up in memorandum form and distributed to the core staff. In all, the general data collection activities served to expand the collective knowledge of the study team regarding the unique natures of Indian resource, economic, community, and manpower development and to prepare the staff for field work.

The off-site data collection activities involving the individual study sites included, as a minimum, securing and reviewing the OEDP document and the CETA plans. Moreover, where possible, any additional documents which discussed the history, culture, and current development status of the reservations

were collected. Much of this data collection was carried on subsequent to the verification phone call (see Field Logistics Planning, above). The field team routinely requested copies of any relevant reports and inquired about any additional information which could be made available prior to the field trip. Also, after certain field trips, the study team attempted to secure any documents observed or identified on-site which were unavailable at the time of the field visit. Much of the site-specific information obtained in either off-site or on-site data collection activities has not been identified in the Bibliography included with this report.

Material review and analysis activities were conducted both prior and subsequent to field visits. Because of their importance to the study, OEDPs and CETA plans were subjected to extensive review. Three formats were developed to facilitate that review and analysis. These are:

- OEDP Summary
- CETA Plan/Report Summary
- CETA/OEDP Comparisons

These documents (included in Appendix C of this report) were geared to provide the study team with a pre-site assessment of the on-going and planned community and economic development activities, the manpower development activities, and the relationships between the two as expressed in the planning documents which define them. The formats were designed to correspond to the general outlines followed in the larger planning documents. Goals, objectives, and priorities were to be highlighted as were specific program emphasis areas. Care was taken to provide the reviewer with the opportunity to compare the manpower section of the OEDP with the CETA narrative in language, focus, and statistics.

Due to the wide range of materials gathered, no additional formats were developed for document review. However, individual study team staff, where appropriate, reviewed and provided summaries for the project.

On-Site Data Collection

Twenty-five reservations were visited during the field research phase of the effort. Site visits took from two to four days depending on the size, the complexity, and the accessibility of the reservation. Field teams consisted of between one and three members. In all, seven staff members were involved in the field work: Ernest Fazio, Project Director and Dominic Garofalo, Supervising Partner of URSA; James Draper, Field Director and Patricia Kelly, Senior Researcher of Draper/Kelly Associates; and Gerald Wilkinson, Michael Cross, and James Pierce, Native American consultants. The nature of the study dictated that a limited number of skilled field researchers be involved to insure a level of consistency and conformity in data collected and to provide a level of control for data analysis.

As proposed by URSA, an open-ended interview style was used to insure that the maximum amount of information could be collected, that unique areas of interest could be probed, and that the study itself could evolve and adjust as new issues or areas of interest surfaced. On-site field visit teams were advised to learn as much as possible about individual sites prior to the field trip to allow for key areas to be identified and probed at the outset. It was understood that reservations were highly complex social, economic, political, and institutional entities. A field team's work could be useless unless each member had a sophisticated appreciation of the reservation under study.

On-site field activities were shaped around data needs and data sources. A checklist was developped to identify the universe of data needs by source prior to start of field research (see Appendix F). This checklist provided the field team with a reference point to focus on both prior to a field trip (to prepare the visit) and subsequent to a visit (to organize the data collected by source).

The actual on-site field process was developed prior to the intial field test visit to the Lummi and Hoopa Reservations, February 20-24, 1978. The document prepared is included as Appendix D to this report. Subsequently, a refined and updated on-site field process was developed and used by the field teams during the remainder of the field research phase (Appendix E).

Arrangements for field interviews were made by field staff on-site. At a minimum, the CETA Director, EDA Planner, Tribal Chairman, and Tribal Executive Director were to be interviewed. In a number of cases this was not possible. In cases where additional data was required of a source unavailable during the field visit, follow-up interviews by telephone were conducted. Other sources were identified as relevant as the project progressed, and attempts were made to interview them. Such sources included: Manpower Planning Committee members, OEDP committee members, Indian Action Team Directors, BIA Agency Superintendents, Employment Assistance Officers, and Higher Education Officers, Housing Authority Directors, other reservation planners, personnel directors, ANA/CAP program directors, health and social services program directors, and Tribal Enterprise Managers. The actual number of interviews conducted on-site varied, as did the substance of the interview. Care was taken to: (1) relate the business of the interviewee to the CETA program, (2) identify issues involved with CETA, (3) focus on other grant program resources, and (4) identified potential links between CETA and economic and community development.

Study team members preserved their interview notes. Subsequent to field trips, debrieding sessions were held which served to focus on the key issues present at the site, provided a level of control for the study, and enabled the person responsible for preparing the field trip report/case study to be provided with the information needed to prepare that document.

Also discussed at the debriefing were any additional documents collected on-site or to be obtained. At every site, team members were provided written information which supplemented and expanded upon the interview data. For example, in a number of cases, OEDP updates or annual reports were provided which expanded upon the earlier analyzed OEDP. The field team secured a wide range of documentary information on-site which assisted the overall effort.

Among the most critical of the on-site data collection activities was the identification of exemplary approaches to integrating CETA and economic development. As will be discussed in the Data Analysis section of this chapter,

exemplary analysis is a process that of necessity involves a significant level of on-site activity. Due to the limited time available on-site, and the range of potentially exemplary program elements, exemplary data collection was most critical. The field teams focused upon any processes or procedures developed independently by individual study sites that tended to promote linkages with economic development. In order to identify exemplary elements, the interviewer would focus primarily on the CETA Director interview. If certain processes or procedures surfaced out of the interview, the interviewer would attempt to validate their effectiveness by relying upon other respondents.

The on-site data gathering efforts were enhanced by the team building used in the study. Field interviewers were routinely convened to discuss issues of concern, problems, and production approaches which relate to the process of on-site data collection. Hence, in addition to reports of the substantive information secured in the field, team members shared their perceptions of the field experience and incrementally improved the on-site data collection process. This process was most relevant to the gathering of exemplary program related data. Excellent program elements were identified and discussed in debriefing sessions. As field work progressed this process of identification became more sophisticated and the field team became more skilled at identifying unique and innovative approaches in CETA programming. Once identified, the approaches became the focus of the more structured analytical process, discussed below in Data Analysis.

DATA ANALYSIS

The data analysis activities of the URSA approach were geared to the development of two distinct products:

- 25 case studies which detailed the process by which and the degree to which CETA Indian manpower programs were integrated into the economic development plans and activities of the selected sites; and
- The identification of notable or exemplary approaches to integration adopted by selected sites through a comparative analysis.

Case Study Analysis

The development of case studies was a suitable method for tracking the development and implementation of a program or process such as envisioned by the study. However, the purpose of the study dictated that the case studies be more than static descriptions of steps in a developmental process. There was a need to present an overview of the real world situation which shapes and defines the process under scrutiny. It was determined that the case study should transcend the immediate element of inquiry, in this case the process by which CETA and economic development efforts are integrated, and analyze the impact of other exogenous forces upon that element.

The development of site case studies was characterized by a three-step analytical approach. First, a community baseline was prepared for each site. Data collected both off- and on-site was organized into broad general categories which, when taken together, provided the study team with a basic description of the community. These categories can be best described as "environments." Data was aggregated around the cultural environment, the political and the social services environment, the economic environment, etc. The current trends and issues in these "environments" were noted and analyzed given the limits of the study. Quantitative information was supplemented by the qualitative impressions and perceptions gained by field staff during field trips. Such impressions or perceptions, while subjective, were valuable analytical tools in the hands of the study team because they enabled he study team to gain a sense of the community and its dynamics that mere quantitative data can rarely provide. Elements of baselines included:

- Overview--population size, demographics, community history, general issues.
- Cultural environment--traditional versus modernist or assimilationist positions, religious character, retention of traditional patterns, etc.
- Economic environment--income levels, available services, land use, natural resource base, employment base, industry base, developmental potential, trends in business development, Native and non-Native ownership of businesses.

- Political environment--site leadership, decision-making process, appointment or election process, leadership trends, inter- and intra-familial and tribal alliances, community autonomy, etc.
- Social services environment -- housing stock and community services; public assistance levels; service program availability; federal fund sources; BIA historical and current role; role of other federal, state, local government agencies; Native or non-Native control of programs; staffing of programs; service delivery problems or constraints; role of service providers in community, educational system; control of education; Native/non-Native staffing of schools; power generation; public works; health care.

Second, the actual development and implementation of the CETA and OEDP plans were analyzed. This involved the analysis of the written plans and the discussions conducted with the DINAP and EDA representatives involved with the plans, and key individuals or groups who participated in the process on-site. Care was taken to identify the following issues, among others:

- The relationship between OEDP and CETA advisory committees and programs, staffs, and administrators.
- The role of tribal leaders, program administrators and staff, advisory committees, consultants, EDRs, concerned observers, local developers.
- Selection processes--administrator and staff selection, advisory committee selection, consultant selection, etc.
- Planning processes--identification of issues, prioritization of issues, evolution of priorities, long range/short-term considerations, program approaches, program development, schedules.
- Implementation processes--fund allocation, project delivery, fund expansion and management, additional fund sources, program results, program status.

- Relationship of other programs and agencies
- Leadership and control issues--process controlled by tribal leaders, staff, advisory committee, consultants, outside agency or group, etc.
- Participatory and decision-making processes--full participation, pro forma participation, consensus decision-making, public/private decision-making, etc.
- Outside influences--relationship to outlying community, availability of non-governmental financial support, relationship to off-reservation businesses.

The result of these analyses was organized in a chronological format which provided the study team the opportunity to describe the relationships between CETA and the broader on-site economic development plans, the role of key actors involved in the development of the plans, and the impact of key variables (both endogenous and exogenous) on the process.

Third, an attempt was made to identify the strengths and weaknesses of the approach to plan development and thereupon to analyze the reasons why the degree of integration exhibited by the process was achieved. This step was necessary to insure conformity and comparability in the case study process.

Drawing upon the chronology and the baseline, each element was measured against the degree to which it promoted or impeded integration. Thus, on some reservations, a purposeful distinction was made between "people projects" and economic development, and CETA was perceived as a people project while the OEDP was considered economic development. That element, social services environment, was considered a constraint to integration. Likewise, where a strong CETA program administrator promoted integration, his role was noted as an aid to integration. By using this method of debit and credit, the key variables in achieving or failing to achieve integration at a given site began to surface.

A report and analysis form (see Appendix G, below) was developed and used. At best, it was an imperfect and highly subjective attempt to describe a series of complex and subtle interactions. However, by identifying a series of key issues, concerns, organizational schemes and formats beforehand, the overall integrity of the project was preserved and the interest in identifying notable approaches to integration satisfied. Case studies were prepared for each of the study sites. Owing to the exemplary nature of the study, these case studies became more detailed and comprehensive as the field team became more aware of critical issues on the study sites.

Comparative Analysis

The foundation for comparative analysis was set in the site selection process. Certain indigenous factors were to be held constant for a collection of sites so as (1) to provide a baseline for analysis of the effect of variable characteristics and (2) to determine the level of influence or control these fixed factors have on the kind and degree of integration between CETA programs and economic development plans and activities.

In our proposal, URSA anticipated or hypothesized that several kinds or classes of factors would be shown to have affected the level of integration of CETA Indian manpower programs in Indian Economic Development Plans for reservations. The three classes identified were:

- fixed characteristics concerning population size, location and natural wealth of the reservation;
- variable characteristics (in the sense that over time they will or can be changed) such as socioeconomic, education and labor force status of the population; established political and organizational structures; historical and current economic development status; etc.
- characteristics of the CETA and economic development planning processes including how they were structured, who managed them, who participated, at what points was there involvement by outside (non-reservation) people and agencies.

It was also hypothesized that there would be a correlation among characteristics, that is, that a given set of fixed and variable conditions on a reservation would establish certain requirements for an effective planning process. Determination of these correlations was critical to the identification of notable approaches to program integration appropriate for replication by other Indian prime sponsors.

It became apparent early on during the field research phase of the project that the ambitious proposed comparative analysis plan would have to be curtailed. At the outset the study team found that only population would serve as an appropriate fixed characteristic for analysis purposes. Reservation land size and location could not be easily categorized to provide a suitable framework for analysis. Natural resource base, while providing a perspective on the relative wealth of a reservation, was deemed inappropriate for a number of reasons--very few reservations had an adequate inventory of resources, and only a few reservations had been able to exploit their resources to a point where income had been generated. Hence, population served as the critical fixed characteristic for the comparative analysis.

The following table (Table 13) is the base for the study and presents the basic statistics of the reservations included in the study. As the site selection process insured, the sites present a reasonable cross-section of reservations in size, geographic region, and land area. As discussed above in the Introduction, one significant finding regarding population is that the reservations all show an increase in population. In many cases this increase was evident even while surrounding non-reservation areas registered declines in population.

TABLE 13

POPULATION, ESTIMATED ANNUAL GROWTH RATES, AND LAND AREA

TRIBES/POPULATION	POPULATION (ON OR ADJACENT TO RESERVATION) PAST	RECENT	ANNUAL GROWTH RATE	LAND AREA
<1,000				
Hannahville (C)	159 (1972)	230 (1977)	8.9%	3,400 A
Craig (C)	153 (1970)	260 (1977)	10.0%	a
Santee Sioux (P)	269 (1970)	425 (1977)	8.3%	9,221 A
Pyramid Lake (C)	414 (1972)	665 (1977)	12.1%	476,669 A
Nett Lake Chippewa (P)	662 (1972)	750 (1977)	2.7%	41,784 A
Passamaquoddy (C)	620 (1970)	892 (1977)	6.3%	
Indian Township				23,000 A
Pleasant Point				100 A
1,000 - 3,000				
Hoopa (P)	1,074 (1972)	1,300 (1977)	4.2%	86,974 A
Spokane (C)	581 (1972)	1,500 (1977)	31.6%	133,039 A
San Juan Pueblo (C)	1,428 (1972)	1,663 (1977)	3.3%	12,234 A
Mescalero Apache (C)	1,970 (1970)	2,222 (1977)	1.8%	460,000 A
Salt River Pima-Maricopa (P)	---	2,260 (1977)	---	49,294 A
Lummi (C)	937 (1970)	2,500 (1977)	23.8%	7,250 A
Oneida (P)	1,980 (1972)	2,504 (1977)	5.3%	2,600 A
Warm Springs (P/C)	1,575 (1970)	2,881 (1976)	13.8%	637,143 A
3,000 - 5,000				
Fort Hall (C)	2,744 (1972)	3,113 (1977)	2.3%	523,204 A
Fort Berthold (P)	2,750 (1972)	3,226 (1976)	4.3%	417,303 A
Choctaw (P)	3,294 (1972)	4,052 (1976)	5.8%	17,819 A
5,000 - 10,000				
Cherokee, North Carolina (P)	4,880 (1972)	5,729 (1977)	3.5%	56,573 A
San Carlos Apache (P)	4,772 (1972)	6,000 (1977)	5.1%	1,826,541 A
Wind River (P)	4,277 (1971)	6,742 (1977)	9.6%	1,888,000 A
Fort Peck (P)	6,202 (1973)	6,800 (1977)	2.4%	878,267 A
>10,000				
Rosebud (P)	7,488 (1972)	12,186 (1977)	12.5%	958,792 A
Pine Ridge (P)	11,353 (1972)	12,500 (1977)	2.0%	1,461,320 A
Papago (P)	13,013 (1973)	15,742 (1977)	5.2%	2,855,874 A
Cherokee of Oklahoma (P)	21,414 (1972)	27,619 (1976)	7.2%	17,718 A

[a]Land has not yet been conveyed under ANCSA.
P = Prime; C = Consortium.
Sources: Federal and State Indians Reservations and Indian Trust Areas, U.S. Department of Commerce, 1974; BIA; Tribal OEDPs; most recent CETA or BIA reports.

These population increases reflect both in-migration--increases due to the availability of housing, through HUD; community services, through EDA, HUD, etc.; and jobs, especially through CETA--as well as a naturally high rate of birth among Indian peoples. Increases due to advances in health and subsequent decreases in child mortality, and extensions in life expectancy were also cited as contributing to population increases. These figures are also important in noting that most funding is predicated on 1970 Census information and BIA information which is generally considered conservative. Just in terms of our limited study size one can see the magnitude of the pupulation increase in total reservation terms--almost thirty thousand persons in approximately 5-7 years, against an original base of about 94,000 persons.

The land area figures included in the table reflect both tribally owned and allotted lands. Non-Indian owned land within reservation boundaries is not included in the table. The range in acreage reflects a general finding of the study that suggests that relative wealth and economic development potential are intimately tied to reservation land area. Those reservations with limited land areas are necessarily constrained in the level of economic development which can reasonably be expected. Hence, a reservation such as Oneida in Wisconsin is limited in its development potential. One interesting point to be made however, is that Oneida, the Lummi, and numerous other tribes in the sample are involved in land claims and resource or water rights litigation. The complexity of these issues and their importance to future growth made it additionally inadvisable to use land area as a basis for comparative purposes.

Table 14 below represents the compromise reached in conducting the comparative analysis. Under this method reservations were organized into five categories according to population--under 1000, 1000-3000, 3000-5000, 5000-10,000, and over 10,000. These categories were selected because they reflected not only population but the governmental, political and services infrastructures that are required to support that population. It was hypothesized that interesting issues would surface regarding the relative integration of CETA and economic development and the appropriateness of certain exemplary approaches for replication by other similarly situated reservations.

TABLE 14

POPULATION/LAND AREA

TRIBES/POPULATION	LAND AREA: LESS THAN 25,000 A	25,000 100,000 A	100,000 - 800,000 A	800,000 A & OVER
<1,000	4	1	1	0
1,000 - 3,000	3	2	3	0
3,000 - 5,000	1	0	2	0
5,000 - 10,000	0	1	0	3
>10,000	1	0	0	3
TOTAL	9	4	6	6

As Table14 suggests, smaller tribes tend to have smaller land area while larger tribes tend to have larger land area. The nature of the comparative analysis therefore developed into a measurement of the comparability along population lines of a given variable.

A number of the study variables were dictated by the study purpose--linkages between CETA and economic development--while others surfaced during the field research stage--constraints to economic development. By adopting the matrix approach, the study team was able to use the individual site data in a broad comparative manner. Those variables which tended to produce results which cut across population lines were highlighted in the findings and conclusions that were the results of the analysis.

The exploratory methodology tended to identify different levels at which integration occurs. This suggests that it is probable that any given approach at a site towards integration will be successful on one level but not on another. For example, a close working relationship between the CETA and EDA representatives facilitates integration, but where social or other environmental factors are present which would tend to inhibit integration, integration falters. Thus, in order to generate good working hypotheses or typologies for successful integration, it has been necessary to devise a modular approach on which to base the hypotheses and recommendations. Such a modular approach prevents overgeneralization--i.e., a process which

facilitates integration in one given site may not necessarily be replicable at another site, due to differing socioeconomic or environmental variables between sites. This modular approach allowed the study team to select out those elements of a model integrative approach which would be relevant to the social, economic, political and environmental facets of each site, thus allowing the team to emphasize and capitalize on the positive elements at a given site, and de-emphasize and work around the negative ones.

The work of Phase I has resulted in the generation of a number of exemplary elements which are potentially worthy of replication. During Phase II, a closer examination of these notable approaches will be further analyzed to document and validate their appropriateness for replication by subjecting the sites to a feasibility screening process which will tend to focus on those elements which are the result of the unique forces at work on site at the individual reservations.

APPENDICES

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STUDY SITE RESERVATION PROFILE APPENDIX A

RESERVATION/TRIBE/LOCATION:

RESIDENT POPULATION:

1960: Recent:

RESOURCE BASE:

Land:

Other:

PHYSICAL CHARACTERISTICS:

CULTURAL/HISTORICAL/SOCIOLOGICAL:

ECONOMICS:

Employed:

Unemployment Rate:

CDC:

Page 122 is a blank page

Tribe:

KNOWN VENTURES:

SOURCES OF TRIBAL INCOME:

GOVERNMENTAL STRUCTURE:

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
WASHINGTON, D.C. 20213

APPENDIX B

Dear

I am writing this letter to seek your participation in a study of Comprehensive Employment and Training Act (CETA) Indian and Native American Programs. The Office of Policy, Evaluation and Research (OPER) of the U.S. Department of Labor, working closely with the Division of Indian and Native American Programs (DINAP) has funded this research effort to improve the coordination between CETA Indian and Native American Programs and economic planning and development activities on reservations and Native American communities. The purpose of this project is to determine a means of assuring that future employment and training efforts both reflect the employment needs and opportunities of reservations and promote the objectives of Indian self-determination as spelled out in the Indian Self-Determination and Education Act of 1975.

The project is an attempt to learn more about the planning activities that reservations go through in preparing an Overall Economic Development Plan (OEDP) and other economic and community development activities. This is not an evaluation of your programs. It will not affect your funding. It may affect national policy regarding Indian employment and training programs.

Urban and Rural Systems Associates (URSA) of San Francisco, California, has been selected by the Department of Labor to conduct this study. URSA together with its subcontractor Draper-Kelly Associates (DKA) will be visiting 25 reservations and Native American communities around the United States to learn about the on-going CETA and economic and community development planning activities at those places. Visits are to take about two days. A number of persons including yourself, the CETA staff, the economic development planner, the business manager, and the CETA and OEDP committees will be interviewed. All interviews will be confidential.

A person from URSA will be contacting you shortly to confirm your participation in our project and to answer any questions you may have about it. Your DINAP project officer will also be able to answer questions concerning this project.

I hope that you will be able to participate in this important project.

Sincerely,

ALEXANDER S. MACNABB
Director
Division of Indian and
Native American Programs

UNITED STATES DEPARTMENT OF COMMERCE
Economic Development Administration
Washington, D.C. 20230

The U. S. Department of Labor's Division of Indian and Native American Programs (DINAP) and Office of Policy, Evaluation and Research are funding a research effort to improve the coordination between CETA Programs and economic planning and development activities on reservatiors and Native American communities.

Urban and Rural Systems Associates (URSA) of San Francisco, California has been selected by the Department of Labor to conduct the study. URSA together with its subcontractor Draper-Kelly Associates will visit 25 reservations to obtain information about on-going economic and community development planning activities. A number of persons, including yourself, will be contacted for confidential interviews.

We feel this is an important project which will improve overall coordination between Federal agencies with economic development programs on Indian reservations. It is hoped that you will cooperate fully when contacted by URSA.

Sincerely,

RAY E. TANNER
Special Assistant
for Indian Affairs

APPENDIX C

OEDP - SUMMARY

I. Tribal Organization

Description of Area, Land Use

II. Historical Assessment of Past Development Issues

III. Reservation: Economy and Conditions

Demographics

Resources, Economic Base

Problems

IV. Potentials for Growth, Economic Development

V. Goals and Objectives - Priorities for Development

VI. Project Selection - Listing of Reservation Programs

VII. Plan for Implementation

VIII. Manpower Issues

CETA Recognitions - Comparisons

CETA PLAN/REPORT - SUMMARY

I. Title

Funding Level

FX 77 FX 78

Program Emphasis

II. Description of Economic Condition

III. Labor Force Characteristics

Labor Force

Employed

Unemployed

IV. Objectives and Goals

V. Assessment of Skills Shortages

VI. Manpower Needs

VII. Results and Benefits Expected

VIII. Performance

IX. Problem Areas Identified as Related to Programmatic Areas

X. Projects

CETA-OEDP COMPARISONS

PROJECT TYPE	AMOUNT	RELATION TO PROJECT PRIORITIES	CETA GOALS	OEDP GOALS

- How well do goals of CETA plans mesh with goals of OEDP?

- How well does CETA project funding mesh with economic development activities and with goals cited in the OEDP?

- Did EDA grants follow as a result of OEDP priority listing?

- What activities do EDA-funded planning grants address?

- Do implementation plans of OEDP's call for specific utilization of CETA funding/projects?

PROPOSED FIELD PROCESS AND METHODS APPENDIX D

As URSA/DKA perceive it the field work called for under the contract will involve the following stages:

I. Site Selection

- sites are to be selected during the orientation session
- letters will go out addressed to the Tribal Chairpersons, CETA prime sponsor representatives, etc. requesting the participation of the selected sites/telephone follow-up
- contact with DINAP field staff to expedite the field logistics
- contact with site representatives to expedite field trip
- scheduling/assignments of staff

II. Site Preparation

- secure OEDP and OEDP annual reports. CETA Title III and Title VI reports. NAESP application. DINAP central and regional office materials. Contact appropriate EDR to discern development issues.
- review materials to identify and document linkages between OEDP and CETA efforts, to identify key actors--OEDP committee, CETA board and staff--and to refine site documentation
- identify issues to be considered during field trip
- what other development programs operating on-site

III. Conduct Field Trip

- interview key actors
- secure additional materials
- follow leads identified on-site (especially other federal programs)
- track planning and operating processes

IV. Analyze Data and Prepare Case Study

CETA/ECONOMIC DEVELOPMENT

Off-Site Contacts Checklist

A. Federal

- EDR--EDA business development or public works project applications; OEDP yearly reports
- CETA/DINAP staff, central and regional--Title III and VI plans and reports
- HUD regional office, Indian desk staff--CDBG plans, 701 Planning Grant Reports, Indian Housing Authority reports and applications
- Indian Health Service (IHS) staff--health planning documents, annual reports
- OMBE, SBA (where relevant), applications from reservations

B. State (where relevant)

- "Office of Economic Development"--relevant contacts with reservations
- "Office of Housing and Community Development"--relevant contacts with reservations

C. Local

Tribal Chairman	--	Ascertain economic and community
Business Manager	--	development activities being considered;
CETA Program Director	--	identify key local informants
EDA Planner		
Tribal Planner		

NOTE: All contacts should be made with individuals responsible for the reservation in question. If copies of documents are unavailable, the substance of the documents in question should be sought verbally. Where possible, the DINAP regional staff person should be asked to assist in the securing of documents from other agency representatives.

CETA--ECONOMIC DEVELOPMENT APPENDIX E

Field Process

To Be Followed by Field Teams

A field trip will involve several key interviews and several secondary interviews. The process will vary according to the wishes of the tribe. At the Lummi visit, in addition to individual interviews, a general meeting was convened involving the Chairman, the Executive Director, the Administrative Office, the CETA Coordinator, and the Planning Director of LIBC and a group of interested individuals who made up an ad hoc Manpower Planning Committee. At Hoopa Valley, by and large, individual interviews were conducted.

The first rule is to be flexible and to repond to the needs and desires of the reservation.

TRIBAL CHAIRMAN

The first interview should be with the Tribal Chairman. After the intention of the trip, its length, and the probable results are identified, the discussion will focus on the recent history of the reservation. The interviewers will already have analyzed the OEDP and CETA plans and will therefore be somewhat familiar with the general direction the people appear to be taking. These impressions should be verified.

Once a general overview has been provided the discussion should begin to focus on several critical areas. These include:

The Relative Role of Federal Agencies

What support, advice, guidance, difficulties, problems, etc. have the federal funding agencies provided or created? In general, the agencies discussed should be EDA, IHS, BIA, FmHA, HUD, and CETA. The initial focus should be on the general funding support and the problems created by trying to fit the tribe's needs into federal guideline requirements. Afterwards the Chairman should be asked about the assistance provided by the various federal representatives in the funding and grant administration process. The interviewer should probe to learn of any significant efforts of individual federal reps (EDR, IHS rep, BIA agent, ONAP/ANA person, CETA project officer, etc.) and the type of service or assistance provided. Especially critical are examples where one representative assisted the reservation in linking up his or her grant program to a program from another agency or where representatives impeded integrated efforts that the tribe was trying to develop. The interviewer should attempt to learn more about those integrated projects where two sources of funding (especially capital development and services delivery funds) were combined.

The Tribal Chairman may not be the best source of this information or these subjects in all cases, but it is important that we inquire of his or her general perspective on them.

CETA Potential

The interview should also focus upon the general understanding of the CETA program held by the chairman. The interviewer should ask questions in the following areas:

- What are the reservation's primary CETA objectives?
- What are the different uses the tribe wishes to make of CETA?
- What economic development activities, enterprises, or other long term efforts does CETA currently support?
- What other areas present a potential for CETA to support?
- What constraints does the CETA program currently operate under that limit the establishment of linkages? *(In this latter area certain problems have already surfaced, i.e., profit-making tribal enterprises are not elegible to receive Public Service Employment--Title II or VI--placement; eligibility criteria for Title VI requires enrollees to be unemployed for 15 to 20 weeks which renders individuals who have held part time employment within the time period ineligible; non-Indian employers are reluctant to establish OJT programs; Title III Native American Prime Sponsors often have to compete with Title I Prime Sponsors and other subsidized work programs (WIN) to place individuals; the tribe is unaware of the potential of CETA; etc.)* It is important that we learn of the problems faced by CETA prime sponsors in administering the program so that we can document the extent of a given constraint and the actual ways that certain reservations overcome or handle such constraints.

Local Issues

The local realities of life on the reservation will temper all the interviews. Issues of land ownership--is the land tribally owned, allotted, or alienated to non-Indians, do outstanding leases exist which affect land use rights, etc.--will be critical. Also important are water rights, the Winters doctrine, past damming of lakes and rivers, current fishing or industrial pollution disputes. Hunting and fishing rights and confrontations with state or federal wardens may be critical, as may conflicts between law enforcement and other legal jurisdictions. Law suits may be pending which involve tribal membership or enrollment, land claims, etc. The field team should have a general perspective on these issues prior to arriving on site. Since such issues may be sensitive, the interviewer should not initiate discussions of them. However, the fact remains that it is likely one or more will come up and it will be the responsibility of the field team to place the purpose of our study into a perspective that allows unique local issues to be analyzed.

CETA PROGRAM DIRECTOR AND STAFF

The CETA program staff should be given a considerable amount of attention during the field trip. If possible, the interviews should follow the same general outline as the Tribal Chairman's interview. However, certain issues should be stressed in addition. These include:

- Planning--How is the grant application prepared; who is involved; what is the extent of the involvement; is a planning process involved or a crisis management process; how did NAESP application preparation (if relevant) differ from normal process; what was the extent of participation in the NAESP process; how were the linkages with other programs established.
- Operations--What are the programs currently operating; how were OJT and Work Experience contracts set up (if relevant); are other avenues being sought; how were Title II and VI placements made; what percent of time spent in other tasks; are tribal enterprises receiving CETA focus; what services are available (job development, counseling, referral, placement, follow-up, child care).
- Linkages--What is relationship to planning department, ANA(ONAP) programs, tribal program operations, tribal government, federal programs other than CETA, etc.
- Constraints and Supports--What are major problems with regulations; what are greatest administrative needs; what are greatest programmatic needs; what support gained from other prime sponsors, CETA/DINAP, other federal representatives; what are T&TA needs; what are available T&TA resources.

The size of the program will dictate the level of the inquiry. A sophisiticated program staff should provide us with a wealth of information on operations and planning processes. All programs will be able to discuss constraints (in fact such discussions reinformce our statements that we are not evaluating the program). If the program is large enough to have a full complement of staff positions, interviewers should take care to interview as many as possible. One issue to focus on is the status of the CETA project in relation to the overall tribal government. The program may be part of a personnel department, it may be a separate Manpower division, or (in the case of CETA consortium members) it may merely consist of one records-keeping clerk/coordinator. Another critical issue is the relationship of the program administratively to the major Tribal Planning Department.

As with other interviews, local issues relating to CETA will surface. In pursuing such issues, we should take care to analyze their relevance to our overall effort.

PLANNING DIRECTOR AND STAFF

The Planning Director and his staff are key individuals. It is possible that they will perform the major planning and grantsmanship functions for all programs (even CETA in some cases). The critical issues to discuss include:

- Process--How is planning done for OEDP, individual grant program applications, who is involved; if planning role is broad, how are project operators brought into planning process; if planning role is narrow (only OEDP/EDA related), how are linkages with other reservation programs maintained; what was role in NAESP application process;

- Linkages--Are attempts made to establish planning linkages or secure multiple sources of funding for invididual projects; is potential of CETA for management and staffing of project realized; is CETA program included in planning; etc.
- Federal Relationships--What is relationship to federal agencies (EDA, HUD, etc.); which agencies are viewed as helpful and supportive; which are viewed as responsive to requests for information.
- Constraints--What are major planning problems, how will/can they be resolved, what are problems with fund restrictions, project eligibility, etc.

OTHER GROUPS

It will vary from reservation; however, certain other individuals should be interviewed to provide field staff with the broadest perspective possible. Likely subjects are:

- Indian Housing Authority program (construction work, apprenticeship, facility maintenance issues should be stressed)
- IHS Clinic and staff (water and sewer system issues should be stressed)
- BIA/IAT Programs
- ANA (ne. ONAP) Programs (links between CETA and service delivery)
- local enterprises (if relationships with CETA exist)

The above should be considered guidelines for conducting a field trip. If the pre-trip preparation activities are adequately conducted, the team (or individual) should have a good impression of the reservation. We will try to expand on our pre-trip efforts where possible, but field teams can expect to be somewhat prepared. The question areas included in the guidelines should provide the information we need. Field staff will be expected to file a trip report and to prepare a taped or oral debriefing including as much as possible of the impressions gained, the activities observed, and the issues probed in conducting the study.

APPENDIX F

DATA NEEDS AND SOURCES CHECKLIST

COLLECTED ON-SITE

	DATA SOURCE	IDENTIFIED/CONTACTED
I.	OTHER AGENCY STAFF	
II.	OTHER SITE REPORTS	
III.	CETA PROGRAM STAFF	
IV.	CETA ADVISORY COMMITTEE	
V.	CETA PARTICIPANTS	
VI.	OEDP CONSULTANTS	
VII.	OEDP COMMITTEE	
VIII.	LOCAL DEVELOPERS	
IX.	ON-SITE PROGRAM STAFF	
X.	TRIBAL OR COMMUNITY LEADERS	
XI.	ON-SITE COMMUNITY SERVICE PROVIDERS	
XII.	OTHER (CDC, etc.)	

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: I. OTHER AGENCY STAFF

Data Needs	Date Obtained	Comments
BASELINE		
1) Relationship to Nearby Service Centers		
2) Tie-in to CETA Programming		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: II. OTHER SITE REPORTS

Data Needs	Date Obtained	Comments
BASELINE		
1) Availability of Qualified Professionals		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: III. CETA PROGRAM STAFF

Data Needs and Issues	Date Obtained	Comments
BASELINE		
1) Community Politics and Power Structure		
2) Decision-Making Process in General (formal and informal)		
3) Current Development Activities		
4) Current Services Activities		
5) Availability of Qualified Professionals		
6) Critical Local Issues		
7) Critical Developmental Issues		
8) Program Fund Sources		
9) Important Community Characteristics		
10) Types of Local Economic and Industry Base		
11) Types of Local Businesses and Service Sector		
12) Relevance of OEDP and CETA Plans to ED Potential		
13) Relevance of Other Development Activities to CETA/OEDP		
14) Private Sector Development		
PROCESS RELATED		
1) Staff Selection Process		
2) Advisory Committee Selection Process		
3) Representativeness of Advisory Committees		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: III. CETA PROGRAM STAFF/page 2

	Data Needs	Date Obtained	Comments
4)	Plan Development Process/Schedules		
5)	Leadership/Control of Process (Staff, Committee, Tribal Council)		
6)	Role of Staff		
7)	Role of Tribal Council		
8)	Existence of Consultant		
9)	Role of Consultant		
10)	Role of Other Agencies		
11)	Role of ED Representative		
12)	Role of Federal Monitor		
13)	Critical Issues in Process		
14)	Perceived Relevance of Process		
15)	Perceived Reasons Why Integration of OEDP/CETA Plans Not Achieved		
16)	Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
17)	Perceived Relevance of Integration		
18)	Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives, in Process		
19)	Problems Presented by Federal Regulations/Monitoring		
20)	Problems Presented by Federal Funding Schemes		
21)	Problems Presented by Federal Application Processes		
22)	Perceived Changes Required to Reduce Problems/Ensure Integration		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: III. CETA PROGRAM STAFF/page 3

Data Needs	Date Obtained	Comments
23) Perceived Funding Needs		
24) Perceived Non-Funding Support Needs		
25) Problems Presented by CETA Service Emphasis Over OEDP Economic Development Emphasis		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: IV. CETA ADVISORY COMMITTEE

Data Needs	Date Obtained	Comments
BASELINE		
1) General Community Organization		
2) Community Politics and Power Structure		
3) Decision-Making Process in General (formal and informal)		
4) Critical Local Issues		
5) Critical Developmental Issues		
6) Relevance of OEDP and CETA Plans to ED Potential		
7) Relevance of Other Development Activities to CETA/OEDP		
PROCESS RELATED		
1) Staff Selection Process		
2) Advisory Committee Selection Process		
3) Representativeness of Advisory Committees		
4) Plan Development Process/Schedules		
5) Leadership/Control of Process, Staff, Committees, Tribal Council		
6) Role of Staff		
7) Role of Tribal Council		
8) Role of Consultant		
9) Role of ED Representative		
10) Role of Other Agencies		
11) Critical Issues in Process		
12) Perceived Relevance of Process		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: IV. CETA ADVISORY COMMITTEE/page 2

Data Needs	Date Obtained	Comments
13) Perceived Integration of OEDP/CETA Processes, Plans, and Programs		
14) Perceived Reasons Why Integration Was Not Achieved		
15) Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
16) Perceived Relevance of Integration		
17) Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
18) Problems Presented by Federal Regulations/Monitoring		
19) Problems Presented by Federal Funding Schemes		
20) Problems Presented by Federal Application Processes		
21) Perceived Changes Required to Reduce Problems/Ensure Integration		
22) Perceived Funding Needs		
23) Perceived Non-Funding Support Needs		
24) Problems Presented by CETA Service Emphasis Over OEDP Economic Development Emphasis		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: V. CETA PARTICIPANTS

Data Needs	Date Obtained	Comments
BASELINE		
1) General Community Organization		
2) Placement		
PROCESS RELATED		
1) Leadership/Control of Process (Staff, Committee, Tribal Council)		
2) Role of Staff		
3) Role of Tribal Council		
4) Role of Consultant		
5) Role of Other Agencies		
6) Critical Issues in Process		
7) Perceived Relevance of Process		
8) Perceived Integraion of OEDP/CETA Processes, Plans and Programs		
9) Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
10) Problems Presented by Federal Regulations/Monitoring		
11) Problems Presented by Federal Funding Schemes		
12) Problems Presented by Federal Application Processes		
13) Perceived Changes Required to Reduce Problems/Ensure Integration		
14) Perceived Funding Needs		
15) Perceived Non-Funding Support Needs		
16) Problems Presented by CETA Service Emphasis Over OEDP Economic Development Emphasis		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: VI: OEDP CONSULTANTS

Data Needs and Issues	Date Obtained	Comments
1) General Community Organization		
2) Current Development Activities		
3) Critical Developmental Issues		
4) Program Fund Sources		
5) Type of Local Economic and Industry Base		
6) Types of Local Businesses and Service Sector		
7) Relevance of OEDP and CETA Plans to ED potential		
8) Relevance of other Developmental Activities to CETA/OEDP		
9) Private Sector Development		
PROCESS RELATED		
1) Staff Selection Process		
2) Advisory Committee Selection Process		
3) Representativeness of Advisory Committee		
4) Plan Development Process/Schedules		
5) Leadership/Control of Process (Staff, Committee, Tribal Council)		
6) Role of Staff		
7) Role of Tribal Council		
8) Role of Consultant		
9) Role of ED Representative		
10) Role of Federal Monitor		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: OEDP CONSULTANTS, Page 2

Data Needs	Date Obtained	Comments
11) Critical Issues in Process		
12) Perceived Relevance of Process		
13) Perceived Integration of OEDP/ CETA Processes, Plans and Programs		
14) Perceived Reasons Why Integration was Not Achieved		
15) Perceived needs of OEDP or CETA Processes to Facilitate Integration		
16) Perceived Relevance of Integration		
17) Role of other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
18) Problems Presented by Federal Regulations/Monitoring		
19) Problems Presented by Federal Funding Schemes		
20) Problems Presented by Federal Application Processes		
21) Perceived Changes Required to Reduce Problems/Ensure Integration		
22) Perceived Funding Needs		
23) Perceived Non-Funding Support Needs		
24) Problems Presented by CETA Service Emphasis Over OEDP Economic Development Emphasis		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: VII. OEDP COMMITTEE

Data Needs	Date Obtained	Comments
BASELINE		
1) Current Development Activities		
2) Critical Local Issues		
3) Critical Developmental Issues		
4) Relevance of OEDP and CETA Plans to ED Potential		
5) Relevance of Other Development Activities to CETA/OEDP		
PROCESS RELATED		
1) Staff Selection Process		
2) Advisory Committee Selection Process		
3) Representativeness of Advisory Committees		
4) Plan Development Process/Schedules		
5) Leadership/Control of Process (Staff, Committee, Tribal Council)		
6) Role of Staff		
7) Role of Tribal Council		
8) Role of Consultant		
9) Role of ED Representative		
10) Critical Issues in Process		
11) Perceived Relevance of Process		
12) Perceived Integration of OEDP/CETA Processes, Plans and Programs		
13) Perceived Reasons Why Integration Not Achieved		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: VII. OEDP COMMITTEE, Page 2

Data Needs	Date Obtained	Comments
14) Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
15) Perceived Relevance of Integration		
16) Role of Other Reservation or Community-Based Indian Agencies Corporations, Cooperatives in Process		
17) Problems Presented by Federal Regulations/Monitoring		
18) Problems Presented by Federal Funding Schemes		
19) Problems Presented by Federal Application Processes		
20) Perceived Changes REquired to Reduce Problems/Ensure Integration		
21) Perceived Funding Needs		
22) Perceived non-Funding Support Needs		
23) Problems Presented by CETA service emphasis over OEDP economic development emphasis		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: VIII: LOCAL DEVELOPERS

Data Needs	Date Obtained	Comments
BASELINE		
1) Current Development Activities		
2) Critical Development Issues		
3) Important Community Characteristics		
4) Relationship to Nearby Service Centers		
5) Type of Local Economic and Industry Base		
6) Type of Local Businesses and Service Sector		
7) Relevance of OEDP and CETA Plans to ED Potential		
8) Relevance of Other Development Activities to CETA/OEDP		
9) Private Sector Development		
PROCESS RELATED		
1) Role of Developers		
2) Role of Other Agencies		
3) Critical Issues in Process		
4) Perceived Relevance of Process		
5) Perceived Integration of OEDP/CETA Processes, Plans and Programs		
6) Perceived Reasons Why Integration Not Achieved		
7) Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
8) Perceived Changes Required to Reduce Problems/Ensure Integration		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: VIII: LOCAL DEVELOPERS, Page 2

Data Needs	Date Obtained	Comments
9) Problems Presented by CETA Service Emphasis over OEDP Economic Development Emphasis		
10) Community Perception of Processes and Their Relevance		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: IX. ON-SITE PROGRAM STAFF

Data Needs	Date Obtained	Comments
BASELINE		
1) General Community Organization		
2) Community Politics and Power Structure		
3) Current Development Activities		
4) Current Services Activities		
5) Critical Local Issues		
6) Program Fund Sources		
7) Important Community Characteristics		
8) Types of Local Businesses and Service Sector		
PROCESS RELATED		
1) Leadership/Control of Process (Staff, Committee, Tribal Council)		
2) Role of Staff		
3) Role of Tribal Council		
4) Role of Consultant		
5) Role of Other Agencies		
6) Critical Issues in Process		
7) Perceived Relevance of Process		
8) Perceived Integration of OEDP/ CETA Processes, Plans and Programs		
9) Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
10) Perceived Relevance of Integration		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: IX. ON-SITE PROGRAM STAFF, Page 2

Data Needs	Date Obtained	Comments
11) Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
12) Problems Presented by Federal Regulations/Monitoring		
13) Problems Presented by Federal Funding Schemes		
14) Perceived Changes Required to Reduce Problems/Ensure Integration		
15) Perceived Funding Needs		
16) Perceived Non-Funding Support Needs		
17) Problems Presented by CETA Service Emphasis over OEDP Economic Development Emphasis		
18) Community Perception of Processes and Their Relevance		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: X. TRIBAL OR COMMUNITY LEADERS

Data Needs	Date Obtained	Comments
BASELINE		
1) General Community Organization		
2) Decision-Making Process in General (Formal and Informal)		
3) Current Development Activities		
4) Critical Local Issues		
5) Critical Developmental Issues		
6) Program Fund Sources		
7) Relationship to Nearby Service Centers		
8) Private Sector Development		
PROCESS RELATED		
1) Staff Selection Process		
2) Advisory Committee Selection Process		
3) Representativeness of Advisory Committees		
4) Leadership/Control of Process (Staff, Committee, Tribal Council)		
5) Role of Staff		
6) Role of Tribal Council		
7) Existence of Consultant		
8) Role of Consultant		
9) Role of Other Agencies		
10) Role of Federal Monitor		
11) Critical Issues in Process		

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: X. TRIBAL OR COMMUNITY LEADERS

Data Needs	Date Obtained	Comments
12) Perceived Relevance of Process		
13) Perceived Integration of OEDP/CETA Processes, Plans and Programs		
14) Perceived Needs of OEDP or CETA Processes to Facilitate Integration		
15) Perceived Relevance of Integration		
16) Role of Other Reservation or Community-Based Indian Agencies Corporations, Cooperatives in Process		
17) Problems Presented by Federal Funding Schemes		
18) Problems Presented by Federal Application Processes		
19) Perceived Changes Required to Reduce Problems/Ensure Integration		
20) Perceived Funding Needs		
21) Perceived non-Funding Support Needs		
22) Problems presented by CETA service emphasis over OEDP Economic Development Emphasis		
23) Community Perception of Processes and Their Relevance		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: XI. ON-SITE COMMUNITY SERVICE PROVIDERS

Data Needs & Issues	Date Obtained	Comments
BASELINE		
1) General Community Organization		
2) Decision-Making Process in General (Formal and Informal)		
3) Current Services Activities		
4) Critical Local Issues		
5) Program Fund Sources		
6) Important Community Characteristics		
7) Relationship to Nearby Service Centers		
PROCESS RELATED		
1) Role of Other Agencies		
2) Critical Issues in Process		
3) Perceived Relevance of Process		
4) Perceived Integration of OEDP/ CETA Processes, Plans and Programs		
5) Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
6) Problems Presented by Federal Funding Schemes		
7) Perceived Funding Needs		
8) Problems Presented by CETA Service Emphasis Over OEDP Economic Development Emphasis		
9) Community Perception of Processes and Their Relevance		

Analysis:

DATA NEEDS AND SOURCES

COLLECTED ON-SITE

DATA SOURCE: X. OTHER (CDC, etc.)

Data Needs	Date Obtained	Comments
BASELINE		
1) Community Organization		
2) Current Development Activities		
3) Current Services Activities		
PROCESS RELATED		
1) Role of Other Agencies		
2) Critical Issues in Process		
3) Perceived Relevance of Process		
4) Perceived Integration of OEDP/CETA Processes, Plans and Programs		
5) Perceived Relevance of Integration		
6) Role of Other Reservation or Community-Based Indian Agencies, Corporations, Cooperatives in Process		
7) Problems Presented by Federal Funding Schemes		
8) Perceived Funding Needs		
9) Problems Presented by CETA Service Emphasis over OEDP Economic Development Emphasis		
10) Community Perception of Processes and Their Relevance		

Analysis:

APPENDIX G

STUDY OF
CETA PLANS AND RESERVATION
ECONOMIC DEVELOPMENT
TRIP REPORT

TRIBE:

PRIME SPONSOR:

DATES VISITED:

FIELD TRIP TEAM:

PERSONS INTERVIEWED:

UPDATES IN CETA AND OEDP ACTIVITIES FROM AVAILABLE DOCUMENTS:

OEDP--

Pg 162 - blank pg.

(OEDP cont.)

CETA--

PLANNING ACTIVITIES:

LINKAGES BETWEEN CETA AND ECONOMIC DEVELOPMENT:

FEDERAL ROLE:

(Federal Role, cont.)

UNIQUE EXOGENOUS FACTORS:

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